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Supreme Court, U.S.
FILED

No. 02 431 JUL - 5 2002

OFFICE OF THE CLERK

In The

Supreme Court of the United States

Yvonne Liebel; The Alliance Foundation, Inc.; Alliance Capital, Inc.; Alliance International Development Corporation; DTL-USA, Inc.; and General Homes, Inc., (The "Alliance Entities"),

Petitioners,

v.

Visiting Nurse Association of Ridgefield, Inc.; Thomas F. Reynolds; Joyce Ligi; Helena Nicholas; Washington Mutual Bank, F.A.; Sandy McArthur; Paul Rossitto; Rene Heinecke; Eugene Grant, Esq.; Robert Nagro; Richard Solomon; Ridgefield Bank; Weil, Gotshal and Manges, LLP; Bridge to Brotherhood, Inc.; Mark Hoeing, Esq.; David Stone, Esq.; Ira Millstein, Esq.; Marvin Jacob, Esq.; Reynolds and Rowella, LLP., PricewaterhouseCoopers, LLP/Kesselman;

Respondents.

On Petition For Writ Of Certiorari
To State of Connecticut Supreme Court Chief Justice

PETITION FOR WRIT OF CERTIORARI
Vol. III of III

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114 pp

VOL. III - SUPPLEMENT:
INCLUDES INTERVENING MATTER NOT AVAILABLE AT THE TIME OF FILING VOL. I AND VOL. II ON JULY 2, 2002

1. Foreclosure action by Washington Mutual Bank, F.A.

On or about July 13, 2002, the Petitioners, Yvonne Liebel and General Homes, Inc. became aware of a foreclosure action filed against them on June 17, 2002 by Washington Mutual Bank, F.A., filed in the Danbury Superior Court at Danbury, Connecticut, returnable on July16, 2002 (Vol. III, App. I at Page 6.) On July 31, 2001, the Petitioner, Yvonne Liebel filed an appearance on behalf of herself and General Homes, Inc., unable to obtain Connecticut counsel for her corporation. Also on July 31, 2002, Petitioner, Yvonne Liebel filed Motions to Consolidate, and Memorandum of Law, moving the Danbury Superior Court to consolidate the new action and the individual parties involved: Sandy McArthur and Paul Rossito, with the seven related pending actions in this Court. Summary of the case is found in the Motion (Vol. III, App. I at Page 13.) The Danbury Court denied Yvonne Liebel's appearance on behalf of her corporation although she asked the Court to stay proceedings, as the matter of her representing her corporations in Connecticut was pending U.S. Supreme Court ruling.

This new action represents yet another front against the Petitioner Yvonne Liebel and her corporations in the Respondents' war toward her destruction. It is now incorporated by reference into Vol. I, App. C, "Matters Before the Court" as Action # 8, the "Foreclosure Matter" following Action # 7, at Page 123a. The new Respondents' names: Washington Mutual Bank, F.A.; Sandy McArthur; and Paul Rossito, are incorporated by reference into the Section "Parties to the Proceedings" in Vol. I at Page ii;

Petitioners ask this honorable Court that the above named Respondents be incorporated by reference in the Petition, anywhere this Court deems appropriate.

2. U. S. Supreme Court Counsel obtained

On July 12 and 17, 2002, respectively, the Petitioner, Yvonne Liebel received from the U.S. Chief Clerk, orders to revise the cover pages of Vol. I and Vol. II of the Petition for Writ of Certiorari filed on July 2, 2002. The Court ordered that Yvonne Liebel remove the names of the corporations from the cover pages and any reference to her representation of them because she is not admitted as an attorney before the U.S. Supreme Court Bar (Vol. III, App. J at Page-65.) Considering that a substantial part of the original Petition is devoted to the Petitioners' inability to secure zealous Connecticut counsel, removing the corporate names would block any possibility for the corporations to appeal the Connecticut Court decisions. Desperate to save her civil rights and the lives of her corporations, Petitioner, Yvonne Liebel, drove toward Selma, Alabama, the heart of the civil rights movement. There she was directed to Attorney J.L. Chestnut, Jr. well known for his frontline battles along side Martin Luther King Jr. and others, and founder of Alabama's largest black law firm. Attorney J.L. Chestnut who is admitted before this Court since 1975, agreed to represent the corporations before the United States Supreme Court only, and his name appears on the revised covers of the three-volume Petition.

3. Continued violations by the Connecticut Superior Court, Complex Litigation Docket

Since the filing of the original Petition, on July 2, 2002, legal proceedings continued in the four matters before the Waterbury Superior Court, Complex Litigations Docket, violating the Petitioners' rights to stay proceedings pending the U.S. Supreme Court ruling. The Waterbury Superior Court Complex Litigation Docket, however, began violating the Petitioners' constitutional

rights from the outset of the transfer of the cases from the Stamford Superior Court Complex Litigation Docket to that Court in September/October 2001, as evidenced by the Petitioners' Supplemental Brief to their first Petition to the U.S. Supreme Court, dated November 5, 2001 (Vol. III, App. K at Page 73.) The cases were transferred from the Stamford Complex Litigation Docket as a result of the Court violation of the Petitioners' constitutional and civil rights. Further, the Waterbury Complex Litigation Docket scheduled hearings on the respondents' Motion to Strike with witnesses, and a hearing on damages for September 27, 2002, knowing full well that the Petitioner, Yvonne Liebel was out of town, preoccupied with this Petition, and couldn't successfully comply with the Court's orders. The Court intends to dismiss the corporate claims, not on their merit, but for lack of counsel and allow Respondent Eugene M. Grant's fraudulent Notes be awarded damages through a judicially defective process. On August 29, 2002, the Petitioners filed a "Motion to Stay" proceedings in all Connecticut Courts (Vol. III, App. K at Page 105.)

As a result of the new actions and the continued biased conduct of the Waterbury Superior Court, Complex Litigation Docket, in this Volume III of the Petition, the Petitioners are amending their questions to this honorable Court to include, once again, the question they raised in their first Petition for Writ of Certiorari filed in July 2001 (Vol. II, App. H at page 356a):

"Does pretrial managerial judging in Complex Litigation Courts violate due process when the courts depart from state adjudication standards without well publicized body of rules and procedures that is accessible to all litigants? "

In Conclusion

It has been evident for sometime that the giant corporate Respondents and their moles are waging a vicious war against the

Petitioner, Yvonne Liebel, for not relinquishing to them control of her corporations and their assets, covertly and fraudulently stolen from her. Their intent is not only to put an end to her lifelong work, dreams and aspirations, but to also cause her total financial, social and physical collapse. This, while the primary Court handling her litigation against the Respondents, the Waterbury Complex Litigation Docket, gives credence to their actions through rendering decisions in their favor by violating her and the corporations' legal, constitutional and civil rights.

This latest chapter in the Respondents' offensive against the Petitioners includes their unlawful eviction and foreclosure actions to drive them out of their offices and residence while causing them total financial ruin. This marks Yvonne Liebel's five-year lone and traitorous legal battle while being denied counsel to represent her and her corporations' claims, or in the alternative, the right to represent her corporations.

The abuse by collective power that began in her offices several years ago with the Respondents' conspiracy to covertly and forcefully separate her from her corporations, is continuing in the Complex Litigation Docket, the primary Court she was transferred to against her will, on the Respondents' application, and approved by the State of Connecticut as it labeled it "Complex."

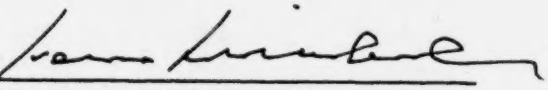
The Petitioner, Yvonne Liebel fails to see the "complexity" in this short-circuited-litigation-process where counsel is denied; where intervention by the Court to appoint counsel and/or assist in obtaining one, is denied; where representation of the corporations by their founder is denied; and where dismissal of the claims without due process of law is rendered on the basis of lack of counsel and not on their merit. No legal process; no public access to the file; no consolidation of cases that must be consolidated; distorted scheduling and docket sheets; no possibility for legitimate trial; simply evaporation of claims through the Complex Litigation Docket's abuse of power.

WHEREFORE, the Petitioners reiterate and pray this honorable Court will review the constitutionality of the Complex Litigation Docket System in the State of Connecticut based on their argument in the first Petition filed in July 2001 (App. H); this Docket's new conduct; the volume of appeals generated by the Docket; and level of criticism by the Connecticut members of the judiciary and litigants alike; and shall transfer the cases from the Waterbury Complex Litigation Docket to the Danbury Superior Court at Danbury, where clear Connecticut law applies; where proper venue lies; and where other related actions are pending, so that the Petitioner, Yvonne Liebel, with her extremely limited resources can finally manage this entire litigation from a single Court and so that justice shall be served;

THAT considering the special circumstances in this case (s) with regard to the Petitioners' inability to secure zealous Connecticut counsel for the past five years due to the Respondents' interference, this honorable Court shall restore the Petitioners' constitutional rights and allow Yvonne Liebel to represent the corporations she founded over a decade ago, so that justice shall be served;

THAT considering their unlawful eviction from their offices, this honorable Court shall overturn the Connecticut Chief Justice Order and other decisions stemming from that Order (App. A in its entirety), rendered in all related cases before this Court (App. C in its entirety) on the basis of the Connecticut Court procedural error and on the basis of its violation of the Petitioners' constitutional rights, so that their offices and their properties can be restored to them in the "eviction matter"; and so that their claims and constitutional rights be restored to them, so justice shall be served.

Respectfully Submitted,



Yvonne Liebel, pro se, P.O. Box 1153, Ridgefield, CT 06877

Appendix I – Documents exhibited in Action # 8, the "Foreclosure Matter"

RETURN DATE: JULY 16, 2002	:	SUPERIOR COURT
WASHINGTON MUTUAL BANK, F.A.	:	J.D. DANBURY
VS.	:	AT DANBURY
LIEBEL, YVONNE, ET AL	:	JUNE 17, 2002

COMPLAINT

1. On July 19, 1999, Yvonne Liebel owed Washington Mutual Bank, F.A. $1, 925,000.00, as evidenced by a promissory note for said sum dated on said date, and payable to the order of Washington Mutual Bank, F.A. with interest from said date, in equal monthly installments of principal and interest.

2. On said date, by a deed of that date, said Yvonne Liebel, to secure said note, mortgaged to Washington Mutual Bank, F.A. the premises known as 104 Great Hill Road and 106 Great Hill Road, Ridgefield, Connecticut, and described in Exhibit A attached hereto and made a part hereof.

3. Said mortgage deed was recorded on the Ridgefield Land Records on July 23, 1999 in Volume 593 at Page 976.

4. Said note and mortgage are now owned by the Plaintiff and the unpaid balance of said note is $2,042,781.43, plus interest from February 1, 2002, late charges and

collection costs have not been paid although due and payable.

5. Said note and mortgage are now in default by virtue of nonpayment of the installments of principal and interest due on march 1, 2002 and each and every month thereafter, and the Plaintiff has exercised its option to declare the entire balance of said note due and payable.

6. The following encumbrances of record upon the property sought to be foreclosed are prior in right to the plaintiff's mortgage and are not affected by this action:

   a. Any taxes, due the Town of Ridgefield that remain outstanding and properly perfected as of the date hereof pursuant to applicable law.
   b. Chase Manhattan Bank, may claim an interest in said premises by virtue of a Mortgage in the original principal amount of $100,000.00 dated December 23, 1998 and recorded December 29, 1998 in Volume 580 at page 830 of the Ridgefield land records.

7. On the aforementioned piece of property, the following interest are claimed which are subsequent to Plaintiff's said mortgage:

   a. The Defendant, General Homes, Inc., may claim an interest in said premises by virtue of a mortgage in the original principal amount of $500,000.00 dated July 19, 1999 and recorded July 23, 1999in Volume 593 at page 987 of the Ridgefield Land Records; and by virtue of a Mortgage in the original principal amount of $1,740,000.00 dated July 19, 1999 and recorded July 23, 1999 in Volume 593 at Page 991 of the Ridgefield Land Records.

b. The Defendant, Casey's Sheet Metal Service, Inc., may claim an interest in said premises by virtue of a Mechanic's Lien in the amount of $597.84 plus interest and fees dated March 15, 2001 and recorded march 16, 2001 in Volume 622 at Page 1055 of the Ridgefield Land Records.

8. Upon information and belief, the defendant, Yvonne Liebel is the owner of record and in possession of said premises.

WHEREFORE, the Plaintiff claims:

1. A foreclosure of said mortgage.
2. Immediate possession of the mortgaged premises.
3. A deficiency judgment. No deficiency will be sought against any person whose obligation under the subject promissory note, has been heretofore or hereafter discharged in bankruptcy, and has not reaffirmed the debt.
4. The appointment of a receiver to collect rents and profits accruing from the premises.
5. Reasonable attorney's fees and costs.
6. Such other relief and further equitable relief as may be required.

NOTICE: A PERSON WHO IS UNEMPLOYED OR UNDER-EMPLOYED AND WHO HAS FOR CONTINUOUS PERIOD OF AT LEAST TWO YEARS PRIOR TO THE COMMENCEMENT OF THIS FORECLOSURE ACTION OWNED AND OCCUPIED THE PROPERTY BEING FORECLOSED AS SUCH PERSON'S PRINCIPAL RESIDENCE, MAY BE ENTITLED TO CERTAIN RELIEF PROVISIONS UNDER SECTION 49-31d to 49-31i, INCLUSIVE, OF THE CONNECTICUT GENERAL STATUTES. YOU SHOULD CONSULT AN ATTORNEY TO DETERMINE YOUR RIGHTS UNDER THIS ACT.

NOTICE: IF ANY PORTION OF THE ENTIRE AMOUNT OF THIS CLAIM IS DISPUTED, YOU ARE TO NOTIFY US WITHIN THIRTY (30) DAYS, INDICATING THE NATURE OF THE DISPUTE. IF YOU DO NOT INDICATE A DISPUTE IN WRITING WITHIN THAT TIME WE WILL ASSUME THE CLAIM TO BE VALID. IF WITHIN THIRTY (30) DAYS YOU INDICATE A DISPUTE IN WRITING, WE WILL PROVIDE YOU WITH EVIDENCE CONCERNING THE VALIDITY OF THE DEBT BY U.S. MAIL. ALSO, UPON YOUR WRITTEN REQUEST WITHIN THIRTY (30) DAYS OF RECEIPT OF THIS NOTICE, WE WILL PROVIDE YOU WITH THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR. THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION RECEIVED WILL BE USED FOR THAT PURPOSE. THE FACT THAT YOU HAVE THIRTY (30) DAYS TO INDICATE A DISPUTE WILL NOT PREVENT US FROM FILING SUIT WITHIN THAT TIME.

This action, is within jurisdiction of the Superior Court.

Dated at Farmington, Connecticut, JUNE 17, 2002.

THE PALAINTIFF,
WASHINGTON MUTUAL BANK, F.A.

BY/S/Jennifer R. Simbosky
Reiner , Reiner & Bendett, P.C.
Its Attorney
160 Farmington Avenue
Farmington, CT 06032
(860) 677-2868
Juris No. 102892

VOL. III

RETURN DATE: JULY 16, 2002	:	SUPERIOR COURT
WASHINGTON MUTUAL BANK, F.A.	:	J.D. DANBURY
VS.	:	AT DANBURY
LIEBEL, YVONNE, ET AL	:	JUNE 17, 2002

STATEMENT OF AMOUNT IN DEMAND

The amount, legal interest or property in demand is $15,000.00 or more, exclusive of interest and costs.

PLAINTIFF,
WASHINGTON MUTUAL BANK, F.A.

BY/S/Jennifer R. Simbosky
Reiner , Reiner & Bendett, P.C.
Its Attorney
160 Farmington Avenue
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(860) 677-2868
Juris No. 102892

RETURN DATE: JULY 16, 2002	:	SUPERIOR COURT
WASHINGTON MUTUAL BANK, F.A.	:	J.D. DANBURY
VS.	:	AT DANBURY
LIEBEL, YVONNE, ET AL THE CHASE MANHATTAN BANK GENERAL HOMES, INC. CASEY'S SHEET METAL SERVICES, INC.	:	JUNE 17, 2002

NOTICE OF LIS PENDENS

Notice is hereby given of the pendency of a civil action between the above named parties by complaint and summons thereon, dated JUNE 17, 2002 and made returnable to the Superior Court for the Judicial District of Danbury at Danbury on July 16, 2002, which action is brought to foreclose a Mortgage to Washington Mutual Bank, F.A. from Yvonne Liebel, dated July 19, 1999 and recorded July 23, 1999, in Volume 593 at Page 976 of the Ridgefield Land Records. Such action specifically requests the following:

1. A foreclosure of said mortgage.
2. Immediate possession of the mortgaged premises.
3. A deficiency judgment.
4. The appointment of a receiver to collect rents and profits accruing from the premises.
5. Reasonable attorney's fees and costs.
6. Such other relief and further equitable relief as maybe required.

The Mortgaged Premises is that certain real property with buildings thereon, situated in the City of Ridgefield, County of Fairfield, and

State of Connecticut, which is at 104 Great Hill Road, Ridgefield, Connecticut, more particularly bounded and described as set forth in Exhibit A, attached hereto and incorporated by reference as if herein set forth verbatim.

RESPECTFULLY SUBMITTED
PLAINTIFF,

BY/S/Jennifer R. Simbosky
Reiner , Reiner & Bendett, P.C.
Its Attorney
160 Farmington Avenue
Farmington, CT 06032
(860) 677-2868
Juris No. 102892

RETURN DATE: JULY 16, 2002	:	**SUPERIOR COURT**
WASHINGTON MUTUAL BANK, F.A.	:	**J. D. DANBURY**
VS.	:	**AT DANBURY**
LIEBEL, YVONNE; CHASE MANHATTAN BANK; GENERAL HOMES, INC.; CASEY'S SHEET METAL SERVICES, INC.	:	**JULY 31, 2002**

MOTION TO CONSOLIDATE and MEMORANDUM OF LAW

Pursuant to Practice Book Section 9-5; Section 61-7(b)(1)(2) of Rules of Appellate Procedures; and Rule 12.4 of the Supreme Court of the United States; the Defendants, Yvonne Liebel and General Homes, Inc., respectfully move this Court for an order consolidating the above captioned matter with all pending actions in the Superior/Appellate/Supreme Court, now pending before the United States Supreme Court, in which the Defendants, Yvonne Liebel and General Homes, Inc., are Petitioners (Exhibit A, Petition for Writ of Certiorari (Cert), filed on July 2, 2002; Two letters from The U.S. Supreme Court Clerk, dated July 12 and 17, 2002, to Yvonne Liebel; and a letter from Yvonne Liebel, to the U.S. Supreme Court Clerk, dated July 22, 2002) (First reference to Washington Mutual Bank is found in Cert, Vol. II, App. H, filed July 2001, Page 380a, First Paragraph; Second reference is found in Cert, Vol. I, Page 16, Last Paragraph; and Page 17, First Paragraph, Line 9.)

NO ORAL ARGUMENT REQUESTED
NO TESTIMONY REQUIRED

The cases sought consolidation with the above captioned matter are entitled:

1. The Alliance Foundation, Inc.; Yvonne Liebel; Alliance Capital, Inc.; Alliance International Development Corp.; and General Homes, Inc. **vs.** Eugene Grant; Robert Nagro; Richard Solomon; Ridgefield Bank; Reynolds and Rowella LLP; Weil, Gotshal and Manges, LLP; Mark Hoeing; David Stone; Ira Millstein; Marvin Jacob; Bridge to Brotherhood, Inc.; PricewaterhouseCoopers, LLP/Kesselman & Kesselman; Docket No. S.C.16722/A.C.22896;
2. Eugene M. Grant vs. The Alliance Foundation, Inc. Docket No. S.C.16723/A.C. 22897;
3. Eugene M. Grant vs. Alliance Capital, Inc. Docket No. S.C.16721/A.C.22895;
4. Eugene M. Grant vs. Alliance Capital, Inc. Docket No. S.C.16719/A.C.22894;
5. DTL-USA, Inc. and Yvonne Liebel vs. Ridgefield Bank Docket No. S.C.16717/A.C. 22892;
6. Visiting Nurse Association of Ridgefield, Inc. vs. The Alliance Foundation, Inc. A.C.22832/S.C.16718/A.C.22893;
7. Rene Heinecke vs. Yvonne Liebel Docket No. CV 98-0333546-S

Summaries of the above seven actions, are found in Cert, Vol. I, App. C, Page 102a.)

All actions arise out of the same fact-pattern and controversy and share common parties, and consolidation would provide for complete determination of the issues, as exhibited in Exhibit A above; Exhibit B, (Third Amended Complaint, filed in Action #1 at the Danbury Superior Court on October 24, 2000, the "Lead Action"); and in various other Exhibits and testimony filed in all actions since the commencement of the first action (#5)(Exhibit

C, Complaint against the Ridgefield Bank), filed in December 1999 at the Danbury Superior Court at Danbury. All Exhibits are attached hereto and incorporated by reference herein.

In addition to the foregoing reasons for consolidation, the Defendants, Yvonne Liebel and General Homes, Inc. state that as a result of irregularities and its unlawful conduct, the Plaintiff, Washington Mutual Bank, F.A., its subsidiaries and/or associates/staff, together with the unlawful collective actions of the opposing parties, Defendants/Plaintiffs: Eugene Grant; Robert Nagro; Richard Solomon; Ridgefield Bank; Reynolds and Rowella LLP; Weil, Gotshal and Manges LLP; Mark Hoenig; David Stone; Ira Millstein; Marvin Jacob; Bridge to Brotherhhod, Inc.; PricewaterhouseCoopers/Kesselman and Kesselman LLP; The Visiting Nurse Association of Ridgefield, Inc.; Thomas F. Reynolds; Helena Nicholas; Joyce Ligi; and Rene Heinecke; the Defendants, Yvonne Liebel and General Homes, Inc. together with other related corporations established and supported by the Defendants Yvonne Liebel and General Homes, Inc.: The Alliance Foundation, Inc.(a 501(c)(3) public charity; Alliance Capital, Inc.; Alliance International Development Corp.; and DTL-USA, Inc.; (collectively named the "Alliance Entities") have been irreparably harmed to a point were these once vibrant entities are now broken down unable to pay their rent, mortgage payments, and other operating expenses and/or fulfill their personal, business and philanthropic objectives (Exhibit D, Selected documents to Support the Defendants' allegations of conspiracy (31 pages).

The filing of this foreclosure action by Washington Mutual Bank, F.A. in lieu of resolving this dispute amicably, as tried so many times by the Defendant, Yvonne Liebel, through Washington Mutual Bank's Fairfield Branch (Ms. Sandy McArthur, Office Manager and Mr. Paul Rossitto, Loan Officer) continues to subject the Defendants, Yvonne Liebel and General Homes, Inc., and their related corporations to destruction, with

the intent to cause their complete collapse and ultimate demise in furtherance of the goals of the conspiracy, more fully described in Count One of Exhibit B (Third Amended Complaint.), "Conspiracy to Destroy a Business".

As to Count #1 of the Plaintiff's Complaint – Plaintiff, Washington Mutual Bank, F.A. (the "Bank") provided a mortgage of $1,925,000 to the Defendant, Yvonne Liebel, equivalent to 55% of the Bank's appraisal of 106 Great Hill Road, Ridgefield, CT 06877 ("Belle Reve"), as of 5/20/99 (Exhibit E, Bank's appraisal dated 6/4/99). In January 2001, Yvonne Liebel ordered a Field Review of said appraisal, which confirmed the Bank's Appraisal of 106 Great Hill Road, at $3,500,000 (Exhibit F, Field Review of above appraisal by a Washington Mutual approved Appraiser, Jennifer O'Neill, dated 2/14/01.) The closing, on or about July 18, 1999, was conducted through fax and overnight mail, as Yvonne Liebel was in California. Shortly after the closing, Attorney for the Defendant, Ann Ragusa of Newtown CT, instructed Yvonne Liebel, based on the Bank's instructions to her, to add the contiguous property, 104 Great Hill Road, by handwriting the number 104 next to 106 Great Hill Road, or else the Bank would not fund the loan. Perplexed and under duress, the Defendant, Yvonne Liebel, wrote 104 on the Open-End Mortgage document as she was in tremendous need of funds due to the expanded litigation. The Attorney, Ann Ragusa later typed in on the Adjustable-Rate Rider the number 104 (Exhibit G, Open-End Mortgate document with Yvonne Liebel's hand written "104" and initials) (Exhibit H, Attorney Ragusa's typewritten addition of 104 next to 106 Great Hill Road on the Adjustable-Rate Rider) The value of 104 Great Hill Road was at $550,000 (Exhibit I, an appraisal by Jennifer O'Neill dated 2/2/01, note the appraiser credentials and her being the Bank's approved appraiser). A valid transaction would have either proceeded with the original closing, or would have increased the value of the appraisal, by agreement with the Defendant/borrower, to $4,050,000 and provided Yvonne Liebel

with a mortgage of $2,227,500. Thereafter, new loan documents would have had to be drawn by the Bank for signature by all parties. The final transaction on July 19, 1999 was not only invalid and inappropriate, but an abuse of power by the Bank against the Defendant/borrower and an act of fraudulent representation and thievery. 104 Great Hill Road is a separate property, owned at the time by General Homes, Inc., a CT corporation. Under these refinance circumstances in which the Bank forcefully and fraudulently seized 104 Great Hill Road, an unnecessary additional equity to support the mortgage, the Bank put at risk the Defendants, Yvonne Liebel and General Homes, Inc. ownership in both homes, as evident in this foreclosure action. The Defendant, Yvonne Liebel held many discussions with the Bank's Fairfield Branch to either increase the mortgage or separate the properties. Finally, after months of negotiations, harassment, misrepresentation, and delays while promising to adjust the appraisal and refinance accordingly, on 8/4/00, the Bank conducted another appraisal. The new appraisal increased the value of 106 Great Hill Road alone from $3,500,000 to $3,600,000 (Exhibit J, Washington Mutual Bank Appraisal as of 8/1/00.) A Field Review of the Bank's August 2000 appraisal revealed that the appraised value of 106 Great Hill Road was at $3,960,000 or $360,000 more than the Bank's appraisal.

Further, the Field Review stated that the Bank's appraisal contained:

"numerous errors in the adjustments. The time adjustment appears inadequate. It appears to be near ½% per month, but due to possible rounding the exact adjustment was not determined. The matched pair (of homes) presented in the report (comparable #5) shows over 1% per month increase in market values...The reviewer found additional sales which support this 1% per month increase... The conclusion of value does not appear reasonable as of the effective date of the

appraisal. If the adjustments in the report are applied correctly to the comparables the conclusion of value in the report must change. After the reviewer considered the adjustments (see attached grid), the conclusion of value changes. The report places greatest emphasis on Comparables #3 and #4. The reviewer concurs. These sales adjust to $4,245,000 and $3,900,000 respectively. If similar adjustments are made to the pending sale (Comparable #5 presented in the report), it indicates a value of $3,904,000. THESE NUMBERS MAKE NO ADJUSTMENT FOR THE "COTTAGE". The "high quality cottage" is a separate parcel in the Ridgefield land records. For purposes of this review the value attributable from the cottage, or second home, is not included. So, the conclusion of value in the appraisal of 106 Great Hill Road, alone without the additional building lot and house, should be $3,960,000 as of August 1, 2000. This value is further supported by an appraisal of the subject property dated May 20, 1999 with a value of $3,500,000. A February 2001 value for the May 1999 appraisal based on the documented time adjustments is 4,200,000. The August 1, 2000 report with time adjustments indicates a value of $4,200,000 as of February 2001. There has not been (as of 2/01) a substantial change in the base economy since the effective date of the appraisal. The documented time adjustment has remained at 1% per month." (Exhibit K, Field Review dated 2/14/01 of the August 1, 2000 Bank appraisal.)

On 5/23/01 the Bank conducted yet another appraisal, promising Yvonne Liebel to correct the situation through a new refinancing which would separate the properties, increase the loan to value ratio to 60%, and keep the same terms as the existing loan. During these months of tug of war Yvonne Liebel was late in making two of her mortgage payments, which were quickly entered into her credit record by the Bank. At the closing, three months later or August 24, 2001, Yvonne Liebel received a copy of the new appraisal (she could not obtain a copy of the appraisal prior to the closing in spite of repeated

requests) of 106 Great Hill Road, at a valuation of $3,600,000 (Exhibit L, Bank's appraisal dated 5/23/01. The new loan documents deleted 104 Great Hill Road from the new mortgage and provided Yvonne Liebel with slightly more cash as the new loan was in the amount of $2,160,000 vs. $1,925,000 (not including significant payouts at closing). However, at the closing Yvonne Liebel realized that the terms of the loan were changed from 40 years amortization to 30 years amortization, substantially increasing the monthly payments. Also, the new mortgage would alter General Homes, Inc.'s position. The corporation held a substantial note against the property, equivalent to the construction cost of 106 Great Hill Road and the sale of its 104 Great Hill Road to Yvonne Liebel. Having gone through this horrendous experience with the Plaintiff Bank, Yvonne Liebel lost trust in the Bank's conduct and motives, and worried about the new payment schedule. After careful reading, at home, of the appraisal and closing documents, on August 26, 2001, Yvonne Liebel faxed and mailed to all parties a Notice of Right to Cancel the transaction, accompanied by a letter to the Bank. In her letter, Yvonne Liebel requested that the Bank amend the documents to reflect the true value of the property at $4,600 (adding 2% appreciation to it January value of $4,100,000; and based on a 60% loan to value ratio increase the mortgage to $2,760,000. She also requested that the Bank immediately release 104 Great Hill Road from the existing loan (Exhibit M, Notice to Cancel and letter dated August 25, 2001.)

The Bank, through its Fairfield Branch, refused to release 104 Great Hill Road; Refused to amend the appraisal; Refused to change the terms of the new refinance to maintain the existing terms; Refused to delete the two late payments from Yvonne Liebel's record. The Fairfield Branch referred Yvonne Liebel to a general phone number at the Bank. Defendant was unable to obtain address or phone number for the Bank's corporate headquarters or its legal department. After making several more

monthly payments approximating $80,000, hoping, unsuccessfully, to resolve the issue, Yvonne Liebel stopped making payments, believing that a foreclosure action would finally put her in touch with the Bank's legal counsel and bring this refinance fiasco to a resolution.

As a result of the failure to refinance; the many months of promises and delays; and the Plaintiff Bank's wrongdoing, Yvonne Liebel:

1. Could not make payments to her landlord on behalf of the Alliance Entities, as she planned, resulting in a judgment to evict the premises (on appeal with other decisions to the United States Supreme Court);
2. Could not obtain financing elsewhere as her credit was destroyed;
3. Could not keep up with operating expenses, putting at risk all assets and legal actions the Alliance Entities brought against the opposing parties;
4. Is now faced with a foreclosure action, subjecting her and General Homes, Inc. to the possible loss of their properties which they have owned; subdivided; developed; designed; and partially built (104 Great Hill Road) between 1987 and 1993 (at approx. cost of $750,000). At the end of 1995, they began construction of 106 Great Hill Road, to serve as a fundraising/think tank location for the charitable activities of The Alliance Foundation, Inc (See Exhibit D, Ridgefield Press article dated Jan.12, 1995 "Foundation Works for Peace", (marked paragraphs on second page). Construction of 106 great Hill Road (Belle Reve) was financed through the sale of shares in General Homes, Inc. and Alliance Capital, Inc. to the Defendant, Eugene M. Grant in Action #1. The loss of these properties would wipe out assets and ideological aspirations built over three decades.

As to Count #6 (a) of the Plaintiff's Complaint-
On December 17, 2001, the Defendant, Yvonne Liebel paid $53, 440.77 in property taxes to the town of Ridgefield for both 104 and 106 Great Hill Road (Exhibit N, Copy of checks and receipts by the town of Ridgefield in the amount of $53,440.77)

As to Count #6 (b) of the Plaintiff's Complaint-
The $100,000 Note to Chase was satisfied on July 23, 1999, at the time of the refinance by the Plaintiff Bank. The Bank knows this as this Note was eliminated from the refinance documents of August 24, 2001(Exhibit O, Cover letter from Attorney, Ann Ragusa to Attorney Hogan Love (provided to Yvonne Liebel and General Homes, Inc. by the Bank for the August 24, 2001 closing); a letter by Attorney Ragusa dated July 23, 1999 and a check for the amount of $100,240.76 confirming payment; a letter from Chase, dated July 27, 2001, confirming receipt of payment.

For the foregoing reasons, and for judicial economy, the Defendants, Yvonne Liebel and General Homes, Inc., respectfully request that all above matters be consolidated at the Danbury Superior Court.

NOTICE and a SWORN AFFIDAVIT: The Defendants, Yvonne Liebel and General Homes, Inc. are filing this disputed claims within 30 days of their receipt of the Complaint, or on or about July 16, 2002. Yvonne Liebel who was traveling, arrived to California on or about July 13, 2002, to where the Complaint was mailed, specifically to spend time with her father who was hospitalized several days prior to her arrival. Therefore, the Appearance form is filed passed the Return Date of July 16, 2002.

THE DEFENDANTS, YVONNE LIEBEL and GENERAL HOMES, INC.

BY_____
Yvonne Liebel, pro se, Founder/CEO/Agent, General Homes, Inc.
Residence: 106 Great Hill Road, Ridgefield, CT 06877
Mailing Address: 8913 Olympic Blvd. #101, Beverly Hills, CA 90211
Tel: 310-657-2771 Fax: 310-657-2731 Cell: 310-435-0769

ORDER

The forgoing Motion to Consolidate having been heard, it is hereby ordered: Granted/Denied

_____
The Court

CERTIFICATION

I, Yvonne Liebel, resident of 106 Great Hill Road, Ridgefield, CT 06877 and Founder/CEO and representative of General Homes, Inc. and other related corporations (collectively named the "Alliance Entities"), hereby certify that on this date, July 31, 2002, served the enclosed Appearance; Motion to Consolidate; and Memorandum of Law on each party to the above and related proceedings or that party's counsel, by fax (where noted by *) and by depositing an envelope

containing the above document in the United States mail properly addressed to each of them and with first-class postage prepaid:

* Jennifer R. Simbosky
Reiner, Reiner & Bendett, P.C.
Its Attorney
160 Farmington Avenue
Farmington, CT 06032
(860) 677-2868
Juris No. 102892

Joseph Clasen, Esq. (counsel/ Grant)
Robinson & Cole, LLP
695 E. Main St.
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Brian C.Wille, Esq (Nagro/Solomon)
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90 Grove St.
Ridgefield, CT 06877
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COURTESY COPIES

Appellate/Supreme Court/ Chief clerk of the Court/ Francis J. Drumm, Jr. 231 Capitol Avenue, Drawer Z, Station A, Hartford, CT 06106 Fax; 860-757-2217

Hon. Michael R. Sheldon c/o Brenda Hamilton, Esq. (The Alliance Foundation, Inc. et al v. Grant et al)
Waterbury Superior Court, Complex Litigation Docket
400 Grand Street, Waterbury, CT 06702 (Tel: 203-236-8232 Fax: 203-236-8234)

Hon. Ginocchio, J. c/o Robin Smith, Esq. (Visiting Nurse Assoc. v. The Alliance Foundation, Inc.)
Danbury Superior Court (Housing)
146 White St., Danbury, CT 06810 (Tel: 203-207-8600 Fax: 203-207-8642)

* Clerk of the Court c/o Robin Smith, Esq. (Washington Mutual Bank vs. Yvonne Liebel; Heineke vs. Liebel; DTL-USA, Inc. and Yvonne Liebel vs. Ridgefield Bank)
Danbury Superior Court (Civil)
146 White St., Danbury, CT 06810
(Tel: 203-207-8600 Fax:203-207-8642)

BY:

Yvonne Liebel, pro se, Founder/CEO and representative of:
The Alliance Foundation, Inc.;Alliance Capital, Inc.;Alliance International Development Corp.; DTL-USA, Inc.; General Homes, Inc.

EXHIBITS ARE NOT FAXED

RETURN DATE: JULY 16, 2002	:	**SUPERIOR COURT**
WASHINGTON MUTUAL BANK, F.A.	:	**J. D. DANBURY**
VS.	:	**AT DANBURY**
LIEBEL, YVONNE; CHASE MANHATTAN	:	
BANK; GENERAL HOMES, INC.; CASEY'S	:	
SHEET METAL SERVICES, INC.	:	**JULY 31, 2002**

MEMORANDUM OF LAW IN SUPPOR OF MOTION TO CONSOLIDATE

The Defendants, Yvonne Liebel and General Homes, Inc., in the above captioned matter have filed a Motion to Consolidate the

above captioned action with the following other related pending actions entitled:

1. The Alliance Foundation, Inc.; Yvonne Liebel; Alliance Capital, Inc.; Alliance International Development Corp.; and General Homes, Inc. vs. Eugene Grant; Robert Nagro; Richard Solomon; Ridgefield Bank; Reynolds and Rowella LLP; Weil, Gotshal and Manges, LLP; Mark Hoeing; David Stone; Ira Millstein; Marvin Jacob; Bridge to Brotherhood, Inc.; PricewaterhouseCoopers, LLP/Kesselman & Kesselman; Docket No. S.C.16722/A.C.22896;
2. Eugene M. Grant vs. The Alliance Foundation, Inc. Docket No. S.C.16723/A.C. 22897;
3. Eugene M. Grant vs. Alliance Capital, Inc. Docket No. S.C.16721/A.C.22895;
4. Eugene M. Grant vs. Alliance Capital, Inc. Docket No. S.C.16719/A.C.22894;
5. DTL-USA, Inc. and Yvonne Liebel vs. Ridgefield Bank Docket No. S.C.16717/A.C. 22892;
6. Visiting Nurse Association of Ridgefield, Inc. vs. The Alliance Foundation, Inc. A.C.22832/S.C.16718/A.C.22893;
7. Rene Heinecke vs. Yvonne Liebel Docket No. CV 98-0333546-S

Summaries of these seven actions, are found in Cert, Vol. I, App. C, Page 102a.)

Defendant, Yvonne Liebel is a Plaintiff in Action # 1 (Exhibit B, Third Amended Complaint); An interested party in actions #2, #3, #4, as Founder/CEO/Chairman and Shareholder/Contributor/Lender and Representative of the Defendant Corporations (Exhibit A (Cert) Vol. II, App. F, Page 315a); A Plaintiff and an interested party in Action #5, as Founder/CEO/Chairman and Shareholder/Contributor/Lender and Representative of the Plaintiff Corporation (Exhibit C, Complaint against Ridgefield

Bank); An interested party in Action #6, as tenant, Founder/CEO/Chairman and Shareholder/Contributor/Lender and Representative of the Defendant Corporation (Exhibit A (Cert) Vol. II, App. F in its entirety); Defendant in Action # 7.

Defendant, General Homes, Inc. is a Plaintiff in Action #1; An interested party in actions #2, #3 and #4 through contractual agreements with the Plaintiff and the Defendant Corporations; An interested party in Action #5 through contractual agreements with a related Corporation to the corporate Plaintiff; An interested party in Action #6, as a tenant and through corporate contractual agreements with the Defendant corporation; An interested party in Action #7, as the financing entity for the Defendant.

The Defendants, Yvonne Liebel and General Homes, Inc. are common to all actions. All cases stem from a common fact pattern involving Yvonne Liebel and General Homes, Inc. and the conspiracy to destroy the Alliance Entities through numerous unlawful acts including the filing of the above captioned fraudulent and malicious Foreclosure action more specifically described in the Motion to Consolidate appended hereto and incorporated by reference herein. Said violations by the Plaintiff, Washington Mutual Bank, F.A. and its subsidiaries/Associates/Personnel in this action furthers the goals and objectives of the conspiracy to destroy Yvonne Liebel, General Homes, Inc. and related corporations collectively named the "Alliance Entities". All cases involve common issues of both law and fact. The consolidation of these matters would serve to avoid the unnecessary cost and delay associated with litigating these matters separately, and facilitate the best interests of the parties and judicial economy.

Discussion:

Practice Book Section 9-5 provides for the consolidation of actions when they should be tried together. Courts have inherent authority to consolidate different pending cases when the circumstances authorize such course, ***Rode V. Adley Express Co. 130 Conn***. 274, 277, 33, A2d, 329 (1943). The procedure of trying two closely related actions together, " which has long been the established practice in this state assists in expediting business without doing anyone an injustice. ***Clarke, et al v. Ochart,*** WL 119765 (Conn. Super.) (1993). Therefore, it is within the sound discretion of this Court to grant this motion to consolidate.

The various factors used by the Courts to examine whether two cases should be consolidated include: i) whether the cases arise out of the same transaction or fact pattern, ii) are the same parties involved, iii) does it serve the interest of judicial economy to consolidate, and iv) does it prejudice the rights of the Defendants ***Groth, et al v. Redmond,*** et al 24 Conn. Sup. 467, 469, 194 A2d 531 (1962). In ***Groth*** the court took all of these factors into consideration before ordering the consolidation. "The public has an interest in the prevention of unnecessary litigation, both because of the burden it places on the state and the resulting crowding of the dockets of the courts." ***Id.***

All of the factors enunciated in ***Groth*** clearly militate in favor of consolidation of said cases pending before the Courts. The present actions arise out of the same facts, making all actions complimentary. The Defendants, Yvonne Liebel and General Homes, Inc. are party to and /or interested parties in all actions and judicial economy is best served by consolidation.

Conclusion:

The Defendants ' Motion to Consolidate should be granted.

THE DEFENDANTS, YVONNE LIEBEL and GENERAL HOMES, INC.

BY_____

Yvonne Liebel, pro se, Founder/CEO/Agent, General Homes, Inc.
Residence: 106 Great Hill Road, Ridgefield, CT 06877
Mailing Address: 8913 Olympic Blvd. #101, Beverly Hills, CA 90211
Tel: 310-657-2771 Fax: 310-657-2731 Cell: 310-435-0769

CERTIFICATION

I, Yvonne Liebel, resident of 106 Great Hill Road, Ridgefield, CT 06877 and Founder/CEO and representative of General Homes, Inc. and other related corporations (collectively named the "Alliance Entities"), hereby certify that on this date, July 31, 2002, served the enclosed Appearance; Motion to Consolidate; and Memorandum of Law on each party to the above and related proceedings or that party's counsel, by fax (where noted by *) and by depositing an envelope containing the above document in the United States mail properly addressed to each of them and with first-class postage prepaid:

* Jennifer R. Simbosky
Reiner, Reiner & Bendett, P.C.
Its Attorney
160 Farmington Avenue
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(860) 677-2868
Juris No. 102892

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Waterbury Superior Court, Complex Litigation Docket
400 Grand Street, Waterbury, CT 06702 (Tel: 203-236-8232 Fax: 203-236-8234)

Hon. Ginocchio, J. c/o Robin Smith, Esq. (Visiting Nurse Assoc. v. The Alliance Foundation, Inc.)
Danbury Superior Court (Housing)
146 White St., Danbury, CT 06810 (Tel: 203-207-8600 Fax: 203-207-8642)

* Clerk of the Court c/o Robin Smith, Esq. (Washington Mutual Bank vs. Yvonne Liebel; Heineke vs. Liebel; DTL-USA, Inc. and Yvonne Liebel vs. Ridgefield Bank)
Danbury Superior Court (Civil)
146 White St., Danbury, CT 06810
(Tel: 203-207-8600 Fax:203-207-8642)

BY:

Yvonne Liebel, pro se, Founder/CEO and representative of:
The Alliance Foundation, Inc.;Alliance Capital, Inc.;Alliance International Development Corp.; DTL-USA, Inc.; General Homes, Inc.

YVONNE LIEBEL and GENERAL HOMES, INC.

P.O. Box 1153
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8913 Olympic Blvd. Suite 101
Beverly Hills, California 90211
Cell: 310-435-0769

July 31, 2002

DANBURY SUPERIOR COURT
JUDICIAL DISTRICT OF DANBURY
AT DANBURY
146 White Street
Danbury, CT 06810

By Fax: 22 Pages with cover 203-207-8642, and by FedEx (with enclosures)

Attn: Ms. Robin Smith (w/encls.)
Deputy Chief clerk

Re: Washington Mutual Bank, F.A. vs. Yvonne Liebel, et al.
Return Date: July 16, 2002

Dear Robin:

Please accept for filing the enclosed Appearance Form and Motion to Consolidate and Memorandum of Law on behalf of General Homes, Inc. and myself, the Defendants in the above foreclosure action. As you know, the issue of my appearance on behalf of General Homes, Inc. is pending before the United States Supreme Court. I would appreciate the Court's consideration in this matter in either allowing continuance in the matter until a ruling is rendered by the Supreme Court; or providing a Court appointed counsel to

advise the Defendants in this matter; or whatever the Court deems appropriate, since I'm unable to secure counsel for the corporation.

Enclosed you will also find an additional set of documents to be filed in the case entitled: Rene Heinecke vs. Yvonne Liebel. Since all other actions, sought to be consolidated have Appellate/Supreme Court Docket numbers, documents are mailed to the Appellate/Supreme Court for filing in these cases, including the Heinecke vs. Liebel case.

In the final page of the Motion to Consolidate you will find a sworn statement, that the first time I saw the Complaint in the above captioned matter was when I arrived to California to visit my father in the hospital, on or about the return date, therefore, I was unable to respond within the deadline. However, in accordance with the Complaint's instructions, the Defendants are responding within 30 days of receipt of the Complaint. Please date-stamp the enclosed 2 copies (one for the Heinecke case and one for the foreclosure matter) and mail to the Ridgefield Address. I thank you for your time and attention to this matter. If possible, please be so kind as to contact me at my cell phone when urgent matters arise, as I'm frequently on the road.

Respectfully yours,

/S/YVONNE LIEBEL, pro se
Representative of General Homes, Inc.

Cc: per certification

DOCKET No. CV: 98-0333546-S	:	**SUPERIOR COURT**
RENE HEINECKE	:	**J. D. DANBURY**
VS.	:	**AT DANBURY**
YVONNE LIEBEL	:	**JULY 31, 2002**

MOTION TO CONSOLIDATE and MEMORANDUM OF LAW

Pursuant to Practice Book Section 9-5; Section 61-7(b)(1)(2) of Rules of Appellate Procedures; and Rule 12.4 of the Supreme Court of the United States; the Defendants, Yvonne Liebel and General Homes, Inc., in the foreclosure action returnable to the Danbury Superior Court on July 16, 2002 entitled: Washington Mutual Bank, F.A. vs. Yvonne Liebel and General Homes, Inc. et al (the "Foreclosure Matter"), respectfully move this Court for an order consolidating the above captioned matter with the Foreclosure Matter and all other pending actions in the Superior/Appellate/Supreme Court, now pending before the United States Supreme Court as more specifically described in prior motions to consolidate and in the Motion to Consolidate and Memorandum of Law filed in the Foreclosure Matter attached hereto and incorporated by reference herein.

NO ORAL ARGUMENT REQUESTED
NO TESTIMONY REQUIRED

THE DEFENDANT, YVONNE LIEBEL

BY_____

Yvonne Liebel, pro se, Founder/CEO/Agent, General Homes, Inc.
Residence: 106 Great Hill Road, Ridgefield, CT 06877
Mailing Address: 8913 Olympic Blvd. #101, Beverly Hills, CA 90211
Tel: 310-657-2771 Fax: 310-657-2731 Cell: 310-435-0769

ORDER

The forgoing Motion to Consolidate having been heard, it is hereby ordered: Granted/Denied

_____
The Court

CERTIFICATION

I, Yvonne Liebel, resident of 106 Great Hill Road, Ridgefield, CT 06877 and Founder/CEO and representative of General Homes, Inc. and other related corporations (collectively named the "Alliance Entities"), hereby certify that on this date, July 31, 2002, served the enclosed Appearance; Motion to Consolidate; and Memorandum of Law on each party to the above and related proceedings or that party's counsel, by fax (where noted by *) and by depositing an envelope containing the above document in the United States mail properly addressed to each of them and with first-class postage prepaid:

* Jennifer R. Simbosky
Reiner, Reiner & Bendett, P.C.
Its Attorney
160 Farmington Avenue
Farmington, CT 06032
(860) 677-2868
Juris No. 102892

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Danbury Superior Court (Civil)
146 White St., Danbury, CT 06810
(Tel: 203-207-8600 Fax:203-207-8642)

BY:

Yvonne Liebel, pro se, Founder/CEO and representative of:
The Alliance Foundation, Inc.;Alliance Capital, Inc.;Alliance International Development Corp.; DTL-USA, Inc.; General Homes, Inc.

EXHIBITS ARE NOT FAXED

YVONNE LIEBEL and GENERAL HOMES, INC.

P.O. Box 1153
Ridgefield, Connecticut 06877
Tel: 310-657-2771 Fax: 310-2731

8913 Olympic Blvd. Suite 101
Beverly Hills, California 90211
Cell: 310-435-0769

July 31, 2002

SUPREME/APPELLATE COURT
Chief Clerk of the Court
Francis J. Drumm, Jr.
231 Capitol Avenue, Drawer Z, Station A
Hartford, CT 06106

By Fax: (860) 757-2217 (22 pages with cover, foreclosure matter only) and by FedEx (entire package)

Re: The Alliance Foundation, Inc. et al. v. Eugene Grant, et al No. S.C.16722
Eugene Grant v. The Alliance Foundation, Inc. No. S.C. 16723
Eugene Grant v. Alliance Capital, Inc. No. S.C. 16721
Eugene Grant v. Alliance Capital, Inc. No. S.C 16719
DTL-USA, Inc. and Yvonne Liebel v. Ridgefield Bank No. S.C. 16717
Visiting Nurse Assoc. Ridgfield, Inc. v. The Alliance Foundation, Inc. No.S.C 16718
Rene Heinecke vs. Yvonne Liebel (Danbury) CV 98-0333546-S
Washington Mutual Bank, F.A. vs. Yvonne Liebel, et al. Return Date: July 16, 2002

Dear Mr. Drumm:

Please accept for filing a copy of an Appearance Form and original Motions to Consolidate and Memorandum of Law on behalf of General Homes, Inc. and myself, the Defendants in the above foreclosure action filed on June 16, 2002 at the Danbury Superior Court. As you know, the issue of my appearance on behalf of the corporations is pending before the United States Supreme Court. Please see the attached letter to the Danbury Superior Court with regard to my appearance on behalf of General Homes, Inc. and proceedings in the foreclosure matter.

Please date-stamp the enclosed face pages for each of the actions listed above and mail to the Ridgefield Address.

I thank you for your time and attention to this matter.

Respectfully yours,

YVONNE LIEBEL, pro se
Representative of General Homes, Inc.

Cc: per enclosed certification

DOCKET No. S.C.16722; A.C. 22896
THE ALLIANCE FOUNDATION, INC. ET AL: STATE OF CONNECTICUT

VS. : SUPREME/APP. COURT

EUGENE GRANT, ET AL : JULY 31, 2002

MOTION TO CONSOLIDATE and MEMORANDUM OF LAW

Pursuant to Practice Book Section 9-5; Section 61-7(b)(1)(2) of Rules of Appellate Procedures; and Rule 12.4 of the Supreme Court of the United States; the Defendants, Yvonne Liebel and General Homes, Inc., in a foreclosure action returnable to the Danbury Superior Court on July 16, 2002 entitled: Washington Mutual Bank, F.A. vs. Yvonne Liebel and General Homes, Inc. et al (the "Foreclosure Matter"), respectfully move this Court for an order consolidating the above captioned matter with the Foreclosure

Matter and all other pending actions in the Superior/Appellate/Supreme Court, now pending before the United States Supreme Court as more specifically described in prior motions to consolidate and in the Motion to Consolidate and Memorandum of Law filed in the Foreclosure Matter attached hereto and incorporated by reference herein.

NO ORAL ARGUMENT REQUESTED
NO TESTIMONY REQUIRED

THE PLAINTIFF, YVONNE LIEBEL

BY_____

Yvonne Liebel, pro se, Founder/CEO/Agent: General Homes, Inc.;
The Alliance Foundation, Inc.
Residence: 106 Great Hill Road, Ridgefield, CT 06877
Mailing Address: 8913 Olympic Blvd. #101, Beverly Hills, CA 90211
Tel: 310-657-2771 Fax: 310-657-2731 Cell: 310-435-0769

ORDER

The forgoing Motion to Consolidate having been heard, it is hereby ordered: Granted/Denied

_____
The Court

CERTIFICATION

I, Yvonne Liebel, resident of 106 Great Hill Road, Ridgefield, CT 06877 and Founder/CEO and representative of General Homes, Inc. and other related corporations (collectively named the "Alliance Entities"), hereby certify that on this date, July 31, 2002, served the enclosed Appearance; Motion to Consolidate; and Memorandum of Law on each party to the above and related proceedings or that party's counsel, by fax (where noted by *) and by depositing an envelope containing the above document in the United States mail properly addressed to each of them and with first-class postage prepaid:

* Jennifer R. Simbosky
Reiner, Reiner & Bendett, P.C.
Its Attorney
160 Farmington Avenue
Farmington, CT 06032
(860) 677-2868
Juris No. 102892

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Appellate/Supreme Court/ Chief clerk of the Court/ Francis J. Drumm, Jr. 231 Capitol Avenue, Drawer Z, Station A, Hartford, CT 06106 Fax; 860-757-2217

Hon. Michael R. Sheldon c/o Brenda Hamilton, Esq. (The Alliance Foundation, Inc. et al v. Grant et al)
Waterbury Superior Court, Complex Litigation Docket
400 Grand Street, Waterbury, CT 06702 (Tel: 203-236-8232 Fax: 203-236-8234)

Hon. Ginocchio, J. c/o Robin Smith, Esq. (Visiting Nurse Assoc. v. The Alliance Foundation, Inc.)
Danbury Superior Court (Housing)
146 White St., Danbury, CT 06810 (Tel: 203-207-8600 Fax: 203-207-8642)

* Clerk of the Court c/o Robin Smith, Esq. (Washington Mutual Bank vs. Yvonne Liebel; Heineke vs. Liebel; DTL-USA, Inc. and Yvonne Liebel vs. Ridgefield Bank)
Danbury Superior Court (Civil)
146 White St., Danbury, CT 06810
(Tel: 203-207-8600 Fax:203-207-8642)

BY:

Yvonne Liebel, pro se, Founder/CEO and representative of:
The Alliance Foundation, Inc.;Alliance Capital, Inc.;Alliance International Development Corp.; DTL-USA, Inc.; General Homes, Inc.

EXHIBITS ARE NOT FAXED

DOCKET No. S.C. 16723; A.C.22897

EUGENE M. GRANT	:	STATE OF CONNECTICUT
VS.	:	SUPREME/APP. COURT
THE ALLIANCE FOUNDATION, INC.	:	JULY 31, 2002

MOTION TO CONSOLIDATE and MEMORANDUM OF LAW

Pursuant to Practice Book Section 9-5; Section 61-7(b)(1)(2) of Rules of Appellate Procedures; and Rule 12.4 of the Supreme Court of the United States; the Defendants, Yvonne Liebel and General Homes, Inc., in the foreclosure action returnable to the Danbury Superior Court on July 16, 2002 entitled: Washington Mutual Bank, F.A. vs. Yvonne Liebel and General Homes, Inc. et al (the "Foreclosure Matter"), respectfully move this Court for an order consolidating the above captioned matter with the Foreclosure Matter and all other pending actions in the Superior/Appellate/Supreme Court, now pending before the United States Supreme Court as more specifically described in prior motions to consolidate and in the Motion to Consolidate and Memorandum of Law filed in the Foreclosure Matter attached hereto and incorporated by reference herein.

NO ORAL ARGUMENT REQUESTED
NO TESTIMONY REQUIRED

THE DEFENDANT, THE ALLIANCE FOUNDATION, INC.

BY_____

Yvonne Liebel, pro se, Founder/CEO/Agent, General Homes, Inc.;
The Alliance Foundation, Inc.
Residence: 106 Great Hill Road, Ridgefield, CT 06877
Mailing Address: 8913 Olympic Blvd. #101, Beverly Hills, CA 90211
Tel: 310-657-2771 Fax: 310-657-2731 Cell: 310-435-0769

ORDER

The forgoing Motion to Consolidate having been heard, it is hereby ordered: Granted/Denied

_____
The Court

CERTIFICATION

I, Yvonne Liebel, resident of 106 Great Hill Road, Ridgefield, CT 06877 and Founder/CEO and representative of General Homes, Inc. and other related corporations (collectively named the "Alliance Entities"), hereby certify that on this date, July 31, 2002, served the enclosed Appearance; Motion to Consolidate; and Memorandum of Law on each party to the above and related proceedings or that party's counsel, by fax (where noted by *) and by depositing an envelope containing the above document in the United States mail properly addressed to each of them and with first-class postage prepaid:

* Jennifer R. Simbosky
Reiner, Reiner & Bendett, P.C.
Its Attorney
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(860) 677-2868
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Michael K. Stanton, Jr. Esq. (counsel for Weil, Gotshal and Manges; Mark Hoenig; David Stone; Bridge To Brotherhood, Inc.; Ira Millstein; and Marvin Jacob)
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Waterbury Superior Court, Complex Litigation Docket
400 Grand Street, Waterbury, CT 06702 (Tel: 203-236-8232 Fax: 203-236-8234)

Hon. Ginocchio, J. c/o Robin Smith, Esq. (Visiting Nurse Assoc. v. The Alliance Foundation, Inc.)
Danbury Superior Court (Housing)
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* Clerk of the Court c/o Robin Smith, Esq. (Washington Mutual Bank vs. Yvonne Liebel; Heineke vs. Liebel; DTL-USA, Inc. and Yvonne Liebel vs. Ridgefield Bank)
Danbury Superior Court (Civil)
146 White St., Danbury, CT 06810
(Tel: 203-207-8600 Fax:203-207-8642)

BY:

Yvonne Liebel, pro se, Founder/CEO and representative of:
The Alliance Foundation, Inc.;Alliance Capital, Inc.;Alliance International Development Corp.; DTL-USA, Inc.; General Homes, Inc.

EXHIBITS ARE NOT FAXED

DOCKET No. S.C. 16721; A.C. 22895

EUGENE M. GRANT	: STATE OF CONNECTICUT
VS.	: SUPREME/APP. COURT
ALLIANCE CAPITAL, INC.	: JULY 31, 2002

MOTION TO CONSOLIDATE and MEMORANDUM OF LAW

Pursuant to Practice Book Section 9-5; Section 61-7(b)(1)(2) of Rules of Appellate Procedures; and Rule 12.4 of the Supreme Court of the United States; the Defendants, Yvonne Liebel and General Homes, Inc., in the foreclosure action returnable to the Danbury Superior Court on July 16, 2002 entitled: Washington Mutual Bank, F.A. vs. Yvonne Liebel and General Homes, Inc. et al (the "Foreclosure Matter"), respectfully move this Court for an order consolidating the above captioned matter with the Foreclosure Matter and all other pending actions in the Superior/Appellate/Supreme Court, now pending before the United States Supreme Court as more specifically described in prior motions to consolidate and in the Motion to Consolidate and Memorandum of Law filed in the Foreclosure Matter attached hereto and incorporated by reference herein.

NO ORAL ARGUMENT REQUESTED
NO TESTIMONY REQUIRED

THE DEFENDANT, ALLIANCE CAPITAL, INC.

BY_____

Yvonne Liebel, pro se, Founder/CEO/Agent, General Homes, Inc.;
Alliance Capital, Inc.
Residence: 106 Great Hill Road, Ridgefield, CT 06877
Mailing Address: 8913 Olympic Blvd. #101, Beverly Hills, CA 90211
Tel: 310-657-2771 Fax: 310-657-2731 Cell: 310-435-0769

ORDER

The forgoing Motion to Consolidate having been heard, it is hereby ordered: Granted/Denied

_____
The Court

CERTIFICATION

I, Yvonne Liebel, resident of 106 Great Hill Road, Ridgefield, CT 06877 and Founder/CEO and representative of General Homes, Inc. and other related corporations (collectively named the "Alliance Entities"), hereby certify that on this date, July 31, 2002, served the enclosed Appearance; Motion to Consolidate; and Memorandum of Law on each party to the above and related proceedings or that party's counsel, by fax (where noted by *) and by depositing an envelope containing the above document in the United States mail properly addressed to each of them and with first-class postage prepaid:

* Jennifer R. Simbosky
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Hon. Michael R. Sheldon c/o Brenda Hamilton, Esq. (The Alliance Foundation, Inc. et al v. Grant et al)
Waterbury Superior Court, Complex Litigation Docket
400 Grand Street, Waterbury, CT 06702 (Tel: 203-236-8232 Fax: 203-236-8234)

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Danbury Superior Court (Housing)
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Danbury Superior Court (Civil)
146 White St., Danbury, CT 06810
(Tel: 203-207-8600 Fax:203-207-8642)

BY:

Yvonne Liebel, pro se, Founder/CEO and representative of:
The Alliance Foundation, Inc.;Alliance Capital, Inc.;Alliance International Development Corp.; DTL-USA, Inc.; General Homes, Inc.

EXHIBITS ARE NOT FAXED

DOCKET No. S.C. 16719; A.C. 22894

EUGENE M. GRANT	:	STATE OF CONNECTICUT
VS.	:	SUPREME/APP. COURT
ALLIANCE CAPITAL, INC.	:	JULY 31, 2002

MOTION TO CONSOLIDATE and MEMORANDUM OF LAW

Pursuant to Practice Book Section 9-5; Section 61-7(b)(1)(2) of Rules of Appellate Procedures; and Rule 12.4 of the Supreme Court of the United States; the Defendants, Yvonne Liebel and General Homes, Inc., in the foreclosure action returnable to the Danbury Superior Court on July 16, 2002 entitled: Washington Mutual Bank, F.A. vs. Yvonne Liebel and General Homes, Inc. et al (the "Foreclosure Matter"), respectfully move this Court for an order consolidating the above captioned matter with the Foreclosure Matter and all other pending actions in the Superior/Appellate/Supreme Court, now pending before the United States Supreme Court as more specifically described in prior motions to consolidate and in the Motion to Consolidate and Memorandum of Law filed in the Foreclosure Matter attached hereto and incorporated by reference herein.

NO ORAL ARGUMENT REQUESTED
NO TESTIMONY REQUIRED

THE DEFENDANT, ALLIANCE CAPITAL, INC.

BY_____

Yvonne Liebel, pro se, Founder/CEO/Agent, General Homes, Inc.;
Alliance Capital, Inc.
Residence: 106 Great Hill Road, Ridgefield, CT 06877
Mailing Address: 8913 Olympic Blvd. #101, Beverly Hills, CA 90211
Tel: 310-657-2771 Fax: 310-657-2731 Cell: 310-435-0769

ORDER

The forgoing Motion to Consolidate having been heard, it is hereby ordered: Granted/Denied

_____
The Court

CERTIFICATION

I, Yvonne Liebel, resident of 106 Great Hill Road, Ridgefield, CT 06877 and Founder/CEO and representative of General Homes, Inc. and other related corporations (collectively named the "Alliance Entities"), hereby certify that on this date, July 31, 2002, served the enclosed Appearance; Motion to Consolidate; and Memorandum of Law on each party to the above and related proceedings or that party's counsel, by fax (where noted by *) and by depositing an envelope containing the above document in the United States mail properly addressed to each of them and with first-class postage prepaid:

* Jennifer R. Simbosky
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Its Attorney
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Waterbury Superior Court, Complex Litigation Docket
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146 White St., Danbury, CT 06810
(Tel: 203-207-8600 Fax:203-207-8642)

BY:

Yvonne Liebel, pro se, Founder/CEO and representative of:
The Alliance Foundation, Inc.;Alliance Capital, Inc.;Alliance International Development Corp.; DTL-USA, Inc.; General Homes, Inc.

EXHIBITS ARE NOT FAXED

DOCKET No. S.C. 16717; A.C. 22892

DTL-USA, INC. and YVONNE LIEBEL	:	STATE OF CONNECTICUT
VS.	:	SUPREME/APP. COURT
RIDGEFIELD BANK	:	JULY 31, 2002

MOTION TO CONSOLIDATE and MEMORANDUM OF LAW

Pursuant to Practice Book Section 9-5; Section 61-7(b)(1)(2) of Rules of Appellate Procedures; and Rule 12.4 of the Supreme Court of the United States; the Defendants, Yvonne Liebel and General Homes, Inc., in the foreclosure action returnable to the Danbury Superior Court on July 16, 2002 entitled: Washington Mutual Bank, F.A. vs. Yvonne Liebel and General Homes, Inc. et al (the "Foreclosure Matter"), respectfully move this Court for an order consolidating the above captioned matter with the Foreclosure Matter and all other pending actions in the Superior/Appellate/Supreme Court, now pending before the United States Supreme Court as more specifically described in prior motions to consolidate and in the Motion to Consolidate and Memorandum of Law filed in the Foreclosure Matter attached hereto and incorporated by reference herein.

NO ORAL ARGUMENT REQUESTED
NO TESTIMONY REQUIRED

THE PLAINTIFFS, YVONNE LIEBEL AND DTL-USA, INC.

BY_____

Yvonne Liebel, pro se, Founder/CEO/Agent, General Homes, Inc.; DTL-USA, Inc.
Residence: 106 Great Hill Road, Ridgefield, CT 06877
Mailing Address: 8913 Olympic Blvd. #101, Beverly Hills, CA 90211
Tel: 310-657-2771 Fax: 310-657-2731 Cell: 310-435-0769

ORDER

The forgoing Motion to Consolidate having been heard, it is hereby ordered: Granted/Denied

_____
The Court

CERTIFICATION

I, Yvonne Liebel, resident of 106 Great Hill Road, Ridgefield, CT 06877 and Founder/CEO and representative of General Homes, Inc. and other related corporations (collectively named the "Alliance Entities"), hereby certify that on this date, July 31, 2002, served the enclosed Appearance; Motion to Consolidate; and Memorandum of Law on each party to the above and related proceedings or that party's counsel, by fax (where noted by *) and by depositing an envelope containing the above document in the United States mail properly addressed to each of them and with first-class postage prepaid:

* Jennifer R. Simbosky
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(Tel: 203-207-8600 Fax:203-207-8642)

BY:

Yvonne Liebel, pro se, Founder/CEO and representative of:
The Alliance Foundation, Inc.;Alliance Capital, Inc.;Alliance International Development Corp.; DTL-USA, Inc.; General Homes, Inc.

EXHIBITS ARE NOT FAXED

DOCKET No. A.C. 22832; S.C. 16718; A.C. 22893

VISITING NURSE OF RIDGEFIELD, INC.	:	STATE OF CONNECTICUT
VS.	:	SUPREME/APP. COURT
THE ALLIANCE FOUNDATION, INC.	:	JULY 31, 2002

MOTION TO CONSOLIDATE and MEMORANDUM OF LAW

Pursuant to Practice Book Section 9-5; Section 61-7(b)(1)(2) of Rules of Appellate Procedures; and Rule 12.4 of the Supreme Court of the United States; the Defendants, Yvonne Liebel and General Homes, Inc., in the foreclosure action returnable to the Danbury Superior Court on July 16, 2002 entitled: Washington Mutual Bank, F.A. vs. Yvonne Liebel and General Homes, Inc. et al (the "Foreclosure Matter"), respectfully move this Court for an order consolidating the above captioned matter with the Foreclosure Matter and all other pending actions in the Superior/Appellate/Supreme Court, now pending before the United States Supreme Court as more specifically described in prior motions to consolidate and in the Motion to Consolidate and Memorandum of Law filed in the Foreclosure Matter attached hereto and incorporated by reference herein.

NO ORAL ARGUMENT REQUESTED
NO TESTIMONY REQUIRED

THE DEFENDANT, THE ALLIANCE FOUNDATION, INC.

BY_____

Yvonne Liebel, pro se, Founder/CEO/Agent, General Homes, Inc.;
The Alliance Foundation, Inc.
Residence: 106 Great Hill Road, Ridgefield, CT 06877
Mailing Address: 8913 Olympic Blvd. #101, Beverly Hills, CA 90211
Tel: 310-657-2771 Fax: 310-657-2731 Cell: 310-435-0769

ORDER

The forgoing Motion to Consolidate having been heard, it is hereby ordered: Granted/Denied

_____
The Court

CERTIFICATION

I, Yvonne Liebel, resident of 106 Great Hill Road, Ridgefield, CT 06877 and Founder/CEO and representative of General Homes, Inc. and other related corporations (collectively named the "Alliance Entities"), hereby certify that on this date, July 31, 2002, served the enclosed Appearance; Motion to Consolidate; and Memorandum of Law on each party to the above and related proceedings or that party's counsel, by fax (where noted by *) and by depositing an envelope containing the above document in the United States mail properly addressed to each of them and with first-class postage prepaid:

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Its Attorney
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Danbury Superior Court (Civil)
146 White St., Danbury, CT 06810
(Tel: 203-207-8600 Fax:203-207-8642)

BY:

Yvonne Liebel, pro se, Founder/CEO and representative of:
The Alliance Foundation, Inc.;Alliance Capital, Inc.;Alliance International Development Corp.; DTL-USA, Inc.; General Homes, Inc.

EXHIBITS ARE NOT FAXED

DOCKET No. CV: 98-0333546-S

RENE HEINECKE	: STATE OF CONNECTICUT
VS.	: SUPREME/APP. COURT
YVONNE LIEBEL	: JULY 31, 2002

MOTION TO CONSOLIDATE and MEMORANDUM OF LAW

Pursuant to Practice Book Section 9-5; Section 61-7(b)(1)(2) of Rules of Appellate Procedures; and Rule 12.4 of the Supreme Court of the United States; the Defendants, Yvonne Liebel and General Homes, Inc., in the foreclosure action returnable to the Danbury Superior Court on July 16, 2002 entitled: Washington Mutual Bank, F.A. vs. Yvonne Liebel and General Homes, Inc. et al (the "Foreclosure Matter"), respectfully move this Court for an order consolidating the above captioned matter with the Foreclosure Matter and all other pending actions in the Superior/Appellate/Supreme Court, now pending before the United States Supreme Court as more specifically described in prior motions to consolidate and in the Motion to Consolidate and Memorandum of Law filed in the Foreclosure Matter attached hereto and incorporated by reference herein.

NO ORAL ARGUMENT REQUESTED
NO TESTIMONY REQUIRED

THE DEFENDANT, YVONNE LIEBEL

BY_____

Yvonne Liebel, pro se, Founder/CEO/Agent, General Homes, Inc.
Residence: 106 Great Hill Road, Ridgefield, CT 06877
Mailing Address: 8913 Olympic Blvd. #101, Beverly Hills, CA 90211
Tel: 310-657-2771 Fax: 310-657-2731 Cell: 310-435-0769

ORDER

The forgoing Motion to Consolidate having been heard, it is hereby ordered: Granted/Denied

_____
The Court

CERTIFICATION

I, Yvonne Liebel, resident of 106 Great Hill Road, Ridgefield, CT 06877 and Founder/CEO and representative of General Homes, Inc. and other related corporations (collectively named the "Alliance Entities"), hereby certify that on this date, July 31, 2002, served the enclosed Appearance; Motion to Consolidate; and Memorandum of Law on each party to the above and related proceedings or that party's counsel, by fax (where noted by *) and by depositing an envelope containing the above document in the United States mail properly addressed to each of them and with first-class postage prepaid:

* Jennifer R. Simbosky
Reiner, Reiner & Bendett, P.C.
Its Attorney
160 Farmington Avenue
Farmington, CT 06032
(860) 677-2868
Juris No. 102892

Joseph Clasen, Esq. (counsel/ Grant)
Robinson & Cole, LLP
695 E. Main St.
P.O.Box 10305, Stamford, CT 06904
Tel: (203) 462-7500 Fax: (203) 462-7599

Brian C.Wille, Esq (Nagro/Solomon)
Costelanetz and Fink, LLP
530 Fifth Ave.
New York, NY 10036
Tel: (212) 808-8100 Fax: (212) 808-8108

Michael K. Stanton, Jr. Esq. (counsel for Weil, Gotshal and Manges; Mark Hoenig; David Stone; Bridge To Brotherhood, Inc.; Ira Millstein; and Marvin Jacob)
Curtis Mallet-Prevost, Mosle, LLP
695 E. Main St., Stamford, CT 06901
Tel: (203) 359-6200 Fax: (203) 328-2617

Stephen Fogerty, Esq. (Ridgefield Bank)
Halloran & Sage LLP
315 Post Road West
Westport, CT 06880
Tel: (203) 227-2855 Fax: (203) 227-6992

Herbert F. Rosenberg, Esq.
80 Grove Street
Ridgefield, CT 06877
Tel: (203)-438-5324
Fax: (203)-431-4021
(VNA)

John R. Williams, Esq.
Williams and Pattis,
51 Elm Street,
New Haven, CT 06510
Tel: (203)562-9931
Fax: (203)776-9494

Stephen Gerard, Senior Partner
PricewaterhouseCoopers, LLP/Kesselman man, LLP
1177 Ave. of the Americas
New York, NY 10036
Tel: (646) 471-4000

Thomas Reynolds, Senior Partner
Reynolds and Rowella, LLP
90 Grove St.
Ridgefield, CT 06877
Tel: (203) 438-0161

COURTESY COPIES

Appellate/Supreme Court/ Chief clerk of the Court/ Francis J. Drumm, Jr. 231 Capitol Avenue, Drawer Z, Station A, Hartford, CT 06106 Fax; 860-757-2217

Hon. Michael R. Sheldon c/o Brenda Hamilton, Esq. (The Alliance Foundation, Inc. et al v. Grant et al)
Waterbury Superior Court, Complex Litigation Docket
400 Grand Street, Waterbury, CT 06702 (Tel: 203-236-8232 Fax: 203-236-8234)

Hon. Ginocchio, J. c/o Robin Smith, Esq. (Visiting Nurse Assoc. v. The Alliance Foundation, Inc.)
Danbury Superior Court (Housing)
146 White St., Danbury, CT 06810 (Tel: 203-207-8600 Fax: 203-207-8642)

Clerk of the Court c/o Robin Smith, Esq. (Washington Mutual Bank vs. Yvonne Liebel; Heineke vs. Liebel; DTL-USA, Inc. and Yvonne Liebel vs. Ridgefield Bank)
Danbury Superior Court (Civil)
146 White St., Danbury, CT 06810
(Tel: 203-207-8600 Fax:203-207-8642)

BY:

Yvonne Liebel, pro se, Founder/CEO and representative of:
The Alliance Foundation, Inc.;Alliance Capital, Inc.;Alliance International Development Corp.; DTL-USA, Inc.; General Homes, Inc.

EXHIBITS ARE NOT FAXED

Appendix J - Communications with the U.S. Supreme Court, Clerk of the Court

SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001

July 12, 2002

WILLIAM K. SUTER
CLERK OF THE COURT

AREA CODE 202
470-3011

Yvonne Liebel
P.O. Box 1153
Ridgefield, CT 06877

COPY

RE: Yvonne Liebel v. Visiting Nurse Association of Ridgefield, Inc., et al.

Dear Ms. Liebel:

Your petition for a writ of certiorari was received July 5, 2002, and must be returned. As you are not a member of the Bar of this Court, you may not represent any entity other than yourself in this Court. See Rule 34.1 of the Rules of this Court.

Accordingly, your petition is returned in order for you to delete reference to the alliance foundation, Inc., and other entities as petitioners, and to delete your reference as agent/representative of the Alliance Entities.

Furthermore, I do not find that you submitted the docket fee of $300.00 with this petition.

Sincerely,
William K. Suter, Clerk
By:

Francis J. Lorson
(202) 479-3024

Enclosures

Cc: Arthur K. Engle
Michael J. Stanton
Stephen Fogerty
Stephen Gerard
Herbert F. Rosenberg
Brian C. Willie
Karen Linder
Thomas Reynolds
John R. Williams

SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001

July 17, 2002

WILLIAM K. SUTER
CLERK OF THE COURT

AREA CODE 202
470-3011

Yvonne Liebel
8913 Olympic Blvd., Suite 101
Beverly Hills, CA 90211

COPY

RE: Yvonne Liebel v. Visiting Nurse Association of

Dear Ms. Liebel:

This letter is in reference to our recent telephone conversation regarding the above-entitled case. As stated in Mr. Lorson's letter to you dated July 12, 2002, the only correction to the petition was to be made to the cover. As you are not a member of the bar of this court, you must delete the reference to the Alliance Foundation, inc., and other entities as petitioners. I have enclosed a copy of that letter.

Kindly correct the petition so that it complies in all respects with the Rules of the Court and return it to this office promptly so that it may be docketed. Unless the petition is received by this office in corrected form within 60 days of the date of this letter, the petition will not be filed. Rule 14.5.

Three copies of the corrected petition must be served on opposing counsel. Rule 29.3.

Sincerely,
William K. Suter, Clerk
By:

Gail Johnson
(202) 479-3038

Enclosures

THE ALLIANCE ENTITIES

P.O. Box 1153
Ridgefield, Connecticut 06877
Cell: (310) 435-0769

8913 Olympic Blvd., Suite 101
Beverly Hills, CA 90211
Tel: (310) 657-2771
Fax: (310) 657-2731

July 22, 2002

Via: Fax to Ms. Gail Johnson (202) 479-3021 and U.S. Express Mail
(Total of 9 Pages)

Tel: (202) 479- 3024
Ms. Gail Johnson
United States Supreme Court
One First Street – NE
Washington, D.C. 20543

Re: Liebel et al. (The "Alliance Entities") v. Grant et al.
Petition for Writ of Certiorari filed on July 2, 2002

Dear Ms. Johnson:

This is a follow-up letter to our conversation of July 16, 2002.

As you know I arrived in California late on July 13, as my father was hospitalized for heart complications.

On the morning of July 16, 2002, I called to find out about the Petition's status and docket number. You informed me that on

July 13, 2002 a letter by Mr. Frank Lorson was mailed to me to Ridgefield, Connecticut, referring to the Petition being filed on July 5, 2002, and requesting that I delete the names of the corporations from the Petition's cover page and the reference to my representation of the corporations, or obtain counsel for the corporations pursuant to rule 34.1. When I explained that obtaining counsel was not an option available to the corporations as stated in the body of the Petition, and that removing the names of the corporations could jeopardize their claims you informed me that there was no motion I could make to the Court requesting a waiver of such requirement. You also requested that a filing fee of $300.00 be submitted with the 40 petitions I filed with the Court (80 books, Vol. I, and Vol. II), all of which were returned to Ridgefield, Connecticut accompanied by Mr. Lorson's letter.

In our conversation I informed you that the filing of the Petition was not on July 5, 2002 as stated in Mr. Lorson's letter but on Tuesday, July 2, 2002. I was at the Supreme Court with my son on that date to file the Petition and have stamped original petitions as proof. The difference in the dates is significant as July 5, 2002 exceeds the filing deadline. You asked that I mail to you an affidavit and a copy of the two Court stamped cover pages for each of the Volumes. You also said you would amend Mr. Lorson's letter to allow me the standard 60 days, provided by law, to comply with the Court's required revisions, and that you would mail your letter on July 16, 2002, the day we spoke.

To date, July 22, 2002, I have not received your letter. However, enclosed please find:

1. My personal Affidavit for filing the Petition on July 2, 2002;
2. Copies of each of the two cover pages stamped by the Court July 2, 2002;
3. A copy of the cover letter and certification which accompanied the Petition, stamped July, 2, 2002;

4. A copy of an amendment letter to the Petition, filed and stamped July 5, 2002;

Ms. Johnson, when in California I also discovered that foreclosure proceedings commenced against my residence in Connecticut by the lender, Washington Mutual. This requires my immediate attention. Please be so kind as to fax me to 310-657-2731 a copy of your letter as soon as you receive my fax this morning as I must make arrangements to travel to Ridgefield, Connecticut or some other arrangements to get a hold of the Petition books, as I can no longer wait for the mail.

I thank you for your time and attention to this matter.

Sincerely,

/S/Yvonne Liebel
The Alliance Entities

Enc:

AFFIDAVIT

STATE OF CALIFORNIA)
) SS: DATE: JULY 22, 2002
COUNTY OF LOS ANGELES)

I, YVONNE LIEBEL, representative of the Alliance Entities: Yvonne Liebel; The Alliance Foundation, Inc.; Alliance International Development Corp.; Alliance Capital, Inc.; DTL-USA, Inc.; and

General Homes, Inc.; being first duly sworn, do depose and say as follows:

1) I am over eighteen (18) years of age, understand the meaning and obligation of an oath, and have personal knowledge of the statements listed below.

2) I am Founder, Chief Executive Officer and representative of the named corporations listed within the Alliance Entities.

3) That on Tuesday, July, 2, 2002, I was with my son, Jason Liebel, at the United States Supreme Court in Washington D.C. where the Petition for Writ of Certiorari was filed at 13:10 PM together with the attached Cover letter and Certification (attached are two copies of the Court stamped cover pages).

4) That on Thursday, July 5, 2002, I was with my son at the United States Supreme Court where the attached Amendment Letter to the Petition was filed, adding the name of Rene Heinecke to the list of Respondents and her counsel to the Certification page, omitted by an oversight.

5) That under no circumstances whatsoever I'm able to obtain zealous counsel for the corporations of the Alliance Entities, a main issue raised in the Petition for Writ of Certiorari supported by evidence and testimony.

6) That, due to this circumstance I must represent the corporations of the Alliance Entities in order to protect their claims, as fully stated in the body of the Petition, with evidence and testimony to support my claims.

7) That, having no choice in the matter and at the risk of losing the corporations' claims I shall comply with the United States Supreme Court's instructions, to delete the corporations' names and the reference of my representation from the cover of the Petition of Writ of Certiorari.

I certify that the foregoing statements are true and accurate to the best of my knowledge and belief.

_____

/S/Yvonne Liebel

Appendix K- Constitutional rights violations by the Waterbury Superior Court, Complex Litigation Docket

See below:

No. 01-258

In The

Supreme Court of the United States

Yvonne Liebel

Petitioner,

v.

Eugene Grant, Esq.; Robert Nagro; Richard Solomon; Ridgefield Bank; Weil, Gotshal and Manges, LLP; Bridge to Brotherhood, Inc.; Mark Hoeing, Esq.; David Stone, Esq.; Ira Millstein, Esq.; Marvin Jacob, Esq.; Reynolds and Rowella, LLP.; PricewaterhouseCoopers, LLP/Kesselman & Kesselman, LLP.;

Respondents.

On Petition For Writ Of Certiorari
To State Of Connecticut Appellate Court

PETITIONER'S SUPPLEMENTAL BRIEF TO PETITION FOR WRIT OF CERTIORARI

Yvonne Liebel, **Pro Se**
8913 Olimpic Blvd. Suite 101, Beverly Hills, CA 90211
e-mail: yliebel @ aol.com
Tel: (310) 657-2771 Cell: (310) 435-0769 Fax: (310) 657-2731

QUESTIONS PRESENTED

Do the recent actions of the Connecticut Superior Court, through its Complex Litigation Docket, continue to violate the Petitioner's Due Process rights?

Questions addressing violations of Petitioner's constitutional rights to Due Process and Equal Protection Of The Laws under the Fourteenth Amendment of The United States Constitution

This litigant's life and her family's are at risk

PARTIES TO THE PROCEEDINGS

Plaintiffs /Petitioners

Yvonne Liebel, Petitioner, is an individual and has no corporate affiliation; **The Alliance Foundation, Inc.**, a Connecticut 501(c)(3) non-stock corporation; **Alliance Capital, Inc.**, a Connecticut corporation with no parent or publicly held company; **General Homes, Inc.** a Connecticut corporation with no parent or publicly held company; **Alliance International Development Corp.**, a Connecticut corporation with no parent or publicly held company; **DTL-USA, Inc.**, a Connecticut Corporation with no parent or publicly held company.

Defendants/Respondents

Eugene Grant, Esq., an individual and has no corporate affiliation; **Robert Nagro**, an individual and has no corporate affiliation; **Richard Solomon**, an individual and has no corporate affiliation; **Ridgefield Bank**, a Connecticut corporation, a commercial bank with no parent or publicly held company; **Weil, Gotshal and Manges, LLP**, a New York limited Liability Partnership; **Mark Hoeing, Esq.**, an individual and has no corporate affiliation; **David Stone, Esq.**, an individual and has no corporate affiliation; **Bridge to Brotherhood, Inc.**, a New York 501(c)(3) non stock corporation; **Ira Millstein, Esq.**, an individual and has no corporate affiliation; **Marvin Jacob, Esq.**, an individual and has no corporate affiliation; **Reynolds and Rowella, LLP**. a Connecticut , Limited Liability Partnership; **PricewaterhouseCoopers, LLP/Kesselman & Kesselman**, a Delaware Limited Liability Partnership.

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Stamford Complex Litigation Docket Notice, dated Sept. 5, 2001

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Stamford Complex Litigation Docket Notice, dated Sept. 20, 2001

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Petitioner Letter to Waterbury CLD re: Conf., dated Oct. 28, 2001

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Waterbury CLD's Court Reporter's fax letter dated Oct. 30, 2001

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Attorney Kevin Ahern's fax letter re: counsel, dated Oct. 30, 2001

BASIS FOR JURISDICTION

This Supplemental Brief is in response to new intervening matters not available at the time of the Petitioner's filing of the Petition for Writ of Certiorari on July 30, 2001. This Brief is filed in accordance with Rule 15.8 of the Supreme Court of the United States, under which the jurisdiction of this Court is invoked.

STATEMENT OF NEW FACTS

1. Since ***August 26, 2001,*** Petitioner has been and continues to be for the next 45-60 days the primary care giver to her father in California who since the filing of the Writ on ***July 30, 2001*** suffered a second stroke and a heart attack. The following is a temporary change of address for the next 60 days:
Yvonne Liebel c/o DHA Development, Inc.
8913 Olimpic Blvd, Suite 101, Beverly Hills, CA 90211
Tel: (310) 657-2771 Cell: (310) 435-0769 Fax: (310) 657-2731

2. On ***October 11, 2001,*** granted a 30 day extension, a Brief in Opposition was filed by Attorney of Record for respondents: Weil, Gotshal & Manges, LLP; Bridge to Brotherhood, Inc.; Mark Hoenig; David Stone; Ira Millstein; and Marvin Jacob;

3. Due to Petitioner's situation and lack of legal counsel, on ***October 22, 2001*** (due date to file a Reply Brief) Petitioner mailed via U.S. Express Mail, an Application for Extension of Time till ***December 10, 2001*** to file the Reply Brief (App. A). Petitioner did not receive the Court's reply but learned of a November 9, 2001 conference.

4. On ***October 23, 2001,*** Petitioner was examined and a biopsy was taken for an unusual thyroid cystic lesion possibly due to an extended exposure to the water at her residence (to date Petitioner's residence can not be occupied more than on a very limited basis until environmental problems are resolved (Page 18 of Petition)).

5. On *October 23, 2001,* Petitioner received a message on her cell phone at (310) 435-0769 at approx. 2:45PM Pacific Time from Ms. Brenda Hamilton, Esq., Court Officer for Hon. Judge Michael R. Sheldon at the Waterbury Superior Court, Complex Litigation Docket in Waterbury, Connecticut.

6. On *October 24, 2001,* Petitioner returned Ms. Hamilton's call only to find out that five weeks prior, without her knowledge or consent, her case(s) were transferred from the Complex Litigation Docket in Stamford, Connecticut to the Complex Litigation Docket in Waterbury, Connecticut. According to Ms. Hamilton the Judge at the Stamford Complex Litigation Docket recused from these cases due to conflict-of-interest with one of the Defendants' law firms (Ms. Hamilton did not know which law firm) and was transferred to another district (also unknown to Ms. Hamilton). Petitioner was shocked. For the past year, Hon. Judge Tierney was fiercely intent on transferring these cases to his Court and was scheduled to remain in Stamford for an extended term or at least until these cases were concluded. A conflict-of-interest this late in the process; his sudden transfer; and the transfer of the cases to Waterbury Complex Litigation raised more questions than answers. Ms. Hamilton, however, refused to provide Petitioner with any additional information, only that an Initial Status Conference was scheduled for October 29, 2001 at the Waterbury Complex Litigation Docket, Hon. Judge Michael R. Sheldon presiding. Petitioner informed Ms. Hamilton that she was unable to attend the Conference due to her domestic situation; that the corporations had no legal counsel; and that the issues concerning counsel and the transfer of these cases from the Danbury Superior Court in Danbury, Connecticut to <u>any</u> Complex Litigation Docket in the State of Connecticut were pending an appeal to the U.S. Supreme Court. Petitioner also reminded Ms. Hamilton that until the Appeal process was concluded, the Danbury Superior Court had jurisdiction over these cases. Petitioner requested that the Initial Status Conference be delayed until these issues were resolved. Ms. Hamilton promised to convey the message to Hon. Judge Sheldon.

7. On ***October 25, 2001,*** Petitioner called Ms. Rose-anne Rush, Esq. the Court Officer at the Complex Litigation Docket in Stamford to find out about the transfer. Ms. Rush was absent until October 29, 2001. Petitioner also called Attorney Kevin Ahern, who according to Ms. Hamilton, was still listed as attorney for the corporations. Petitioner left a message for Attorney Ahern requesting information.

8. On ***October 26, 2001,*** Petitioner received lab results with regard to the Thyroid Cyst: " Type of cystic lesion cannot be determined as there are only rare poorly preserved follicular cells." Doctor was puzzled by report and ordered a second opinion. Opinion pending.

9. On ***October 26, 2001,*** Petitioner received from Attorney Ahern copies of notices with regard to the transfer. Accordingly, Hon. Judge Chase Rogers replaced Hon. Judge Tierney at the Complex Litigation Docket in Stamford and it was Judge Rogers who recused from these cases. Her recusal provided the basis for the reassignment of these cases to the Chief Administrative Judge of the Civil Division; the cancellation of a Status Conference scheduled for September 12, 2001 at Stamford (App. B); and the subsequent transfer of these cases to the Waterbury Complex Litigation Docket in Waterbury (App. C).

9. On ***October 28, 2001,*** as customary in Connecticut Superior Courts Short Calendar hearings, Petitioner informed Ms. Hamilton, in writing, of her special circumstances in California; the absence of counsel to represent her and the Plaintiff corporations; the pending appeal at the U.S. Supreme Court; and asked Ms. Hamilton to <u>Mark Off Not Ready</u> the scheduled conference (App. D).

10. On ***October 29, 2001,*** although Petitioner pleaded with the Waterbury Complex Litigation Docket in Waterbury to hold off on the Status Conference, Hon. Judge Michael R. Sheldon held the scheduled conference with all opposing counsel present, absent Petitioner(s) and any legal representation for them (App. E). According to Ms. Hamilton, Hon. Judge Sheldon together with

opposing counsel set a litigation schedule. Petitioner was told to expect a 30 page Transcript to be ready on November 6, 2001. At the Conference Hon. Judge Sheldon granted Attorney Kevin Ahern's Motion To Withdraw from representation. Following the conference Attorney Kevin Ahern strongly recommended to Petitioner to immediately obtain new counsel or risk default of cases (App. F).

REASONS FOR GRANTING THE WRIT OF CERTIORARI

The zeal shown by the Connecticut Court System and the Respondents in keeping this case(s) in the Complex Litigation Docket with its vague rules and away from the Connecticut Superior Court where clear cut Connecticut Law is applied, is highly suspect. In an attempt to "fix" and camouflage the outrageous injustice that was done to this Petitioner and the corporations under her care while keeping this case(s) in the Complex Litigation Docket, the Connecticut Court System once again played into the Respondents' powerful hands by transferring the case from the Stamford Court whose conduct since November 15, 2000 clearly demonstrated the adjudication ills of the Complex Litigation Docket (all its rules; decisions; errors and omissions; without exception, were in favor of Defendants and not subject to appeal). It seems the transfer was an attempt to isolate the problem to a single judge at Stamford in an effort to salvage the reputation or existence of this highly criticized Docket, while continuing to subject the Petitioner to its unconstitutional standards and deprive her of her due process rights and the equal protection of the laws.

In addition, when powerful law firms rob their pro-bono clients to serve their own interests (Petition, App. D3, at 26a), confident that those clients couldn't bring a suit against them; Summon their legal Fraternity to protect them against lawsuits even at the cost of violating precious laws; Threaten individual attorneys who braved their peers' pressure, by leaving slashed rabbits on their door step; threaten 'they could never work again in their legal profession'; threaten with sanctions and loss of their license, etc.,

then these powerful law firms have taken the legal system hostage. This Petitioner(s) was a victim of their methods for two and a half years prior to filing the lawsuits and throughout this litigation. In their Brief in Opposition, the Respondents ignored this issue entirely, which has everything to do with their obstruction of justice and the denial of the Petitioner's rights to due process and equal protection of the laws. This is not a State matter as these Respondents would like this Court to believe, but an extreme violation of Federal and Constitutional laws that are subject to this Court's jurisdiction. Their deeds were carefully chronicled in the Petitioner's Third Amended Complaint and supported by necessary exhibits that enabled two Superior Court judges to independently cite them in as Defendants in this litigation. Although the Writ and this Brief were forced to be submitted only with respect to the Petitioner as the corporations "lost" their counsel just prior to the filing of the Writ, the arguments made herein are equally applicable to the Plaintiff corporations that are parties to these proceedings.

CONCLUSION

1.This Petitioner's painful saga with the Complex Litigation Dockets in the State of Connecticut continues to cause significant damage to this case(s) and the only possible relief is a United States Supreme Court decision to return these cases to their original Superior Court in Danbury where proper venue lies and where Connecticut law can provide some shield against the Respondents' actions. This Petitioner prays this Court will grant this transfer.

2.Without the United States Supreme Court's intervention this Petitioner and the corporations under her care will never be able to secure zealous legal counsel to represent their interests, to which they are entitled to under the Constitution of the United States of America, and justice will forever be denied them. This Petitioner prays that this distinguished Court will assist this Petitioner(s) in obtaining such counsel so that justice can be served.

Dated: Beverly Hills, California
November 5, 2001

Respectfully Submitted,

Yvonne Liebel, Pro Se
8913 Olimpic Blvd. Suite 101
Beverly Hills, CA 90211
(310) 657-2771 (310) 435-0769
Fax: (310) 657-2731

APPENDIX A

Yvonne Liebel

8913 Olimpic Blvd, Suite 101,Beverly Hills, CA 90211
Tel: (310) 657-2771 Fax: (310) 657-2731

October 22, 2001

Via: U.S. Express Mail

(202) 479-3024
Mr. Frank Lorson
Chief Deputy Clerk
United States Supreme Court
One First Street – NE
Washington, D.C. 20543

Re: Liebel v. Grant et al
Case No.: 01-258

Dear Mr. Lorson:

With respect to the above matter, any Reply Brief in response to Brief in Opposition filed by Attorney of Record for respondents: Weil, Gotshal & Manges, LLP; Bridge to Brotherhood, Inc.; Mark Hoenig; David Stone; Ira Millstein; and Marvin Jacob, on October 11, 2001 is presently due today, ***October 22, 2001.*** Please allow this correspondence to serve as Application for Extension of Time to file a Reply Brief in response to the Brief in Opposition from the present date of October 22, 2001 to ***December 10, 2001.***

The reason for this requested extension of time is that additional time is necessary in order to allow this Petitioner to try to obtain some legal assistance, complete, finalize and serve a

submission to this Court. In addition, Petitioner, who is in pro se with respect to this matter, for the past couple of months has been and continues to be the primary care giver to her father in California who since the filing of the Petition for Writ of Certiorari on July 30, 2001 had suffered a second stroke and a heart attack. With this fragile and limiting situation Petitioner may or may not be able to file the Reply Brief within this time frame. However, Petitioner wishes to obtain this extension in order to make every effort to respond given the misstatements, discrepancies, omissions, innuendos, and the like in the Respondents' Brief in Opposition.

One example of a misstatement is in the footnotes on page 9 of the Respondents' brief. The respondents refer to August 8, 2001 as the date of service of the Petition in which the corporate Plaintiffs are not represented. This date is incorrect.

Correct date is August 13, 2001. The initial Petition was filed and served on July 30, 2001. On August 8, 2001, Petitioner was requested to correct the petition by removing the corporate petitioners. On August 13, 2001, Petitioner submitted the corrected petition and served the appropriate parties. This was stated in the Court's letter of August 14, 2001, copy of which was sent to the respondents. To support this argument please see the attached letter dated August 15, 2001 from the Petitioner to approximately 650 contributors and friends of the Alliance Foundation, Inc. throughout the U.S, Europe and Israel as part of an ongoing update on this litigation (8 pages). Please also see attached a letter from the law firm of Zeldes, Needle & Cooper of Connecticut responding in the negative to providing the Petitioner and the corporations legal counsel (1 page). This was the Petitioner's latest attempt to secure counsel before preparing, filing and serving the Petition for Writ of Certiorari in pro se.

Given that Petitioner must stay in California for at least the next 30-45 days, kindly forward all future communications during this period to the address listed on this stationary.

Thank you for your time and attention.

Very truly yours,

Yvonne Liebel

Cc: Michael K. Stanton, Esq.
695 East Main Street
Stamford, CT 06901

Stephen Fogerty, Esq.
Halloran & Sage
315 Post Road West
Westport, CT 06880

Frank J. Silvestre, Jr.
Zeldes, Needle & Cooper
1000 Lafayette Blvd.
Post Office Box 1740
Bridgeport, CT 06601-1740

Attachments:

1. Letter dated August 15, 2001 to contributors and friends of The Alliance Foundation, Inc.
2. Letter from Zeldes, Needle & Cooper of Connecticut;
3. Supreme Court Letters

Attachment 1:

THE ALLIANCE FOUNDATION, INC.

August 15, 2001

Dear Alliance Friend and Contributor,

I hope this letter finds you and yours well.

Since I have written to you last, on December 14, 2000, the struggle to save The Alliance Foundation, Inc., its assets and mission, continued both in and out of the Connecticut courts. I'm writing to you from Washington, D.C. where I have spent the last few days finalizing the filing of an appeal to the United States Supreme Court in a form of a "Petition for Writ of Certiorari" booklet.

Let me briefly update you as to what this means and how we got here.

Following several favorable rulings rendered by the Connecticut Superior Court in Danbury, two of which ordered us to amend our complaint to further include as Defendants: Weil, Gotshal and Manges, LLP; Mark Hoeing, Esq.; David Stone, Esq.; Ridgefield Bank; Bridge To Brotherhood, Inc.; Ira Millstein, Esq.; and Marvin Jacob, Esq.; On October 12, 2000, the Defendants filed an application to the Court to transfer the case to the so-called Complex Litigation Docket in another city (Stamford, Connecticut) where their attorneys are located. We vehemently objected to the transfer citing physical, financial and logistic difficulties that would

seriously compromise our ability to litigate our case in a litigation that was already grossly mismatched.

Note: Neither the UJA nor any other charitable or governmental organization which is directly or indirectly connected with the Defendants and to this matter are defendants in this action.

The Connecticut Courts ignored our numerous compelling objections via appeals to the Appellate and Supreme Courts and transferred the case. In the process, the Courts violated our due process rights and our right to equal protection of the laws as guaranteed to us under the Fourteenth Amendment of the United States Constitution by not allowing for a hearing at the Danbury Superior Court prior to the transfer; by holding a "staged" and "un-meaningful" hearing, after the fact, at the Complex Litigation Docket in Stamford; by transferring our litigation to a Court that deviated from State adjudication standards without providing a "road map" as to what rules and procedures the Complex Litigation Docket was subjected to, and/or legal assistance, to enable us to appropriately function within its boundaries. Further, toward the end of the nine months appeal process and without legitimate reasons both our part-time attorneys resigned.

Following a couple of months of lone preparation under extreme physical and emotional conditions and without Connecticut counsel, on July 30, 2001, I filed, in pro se, the Petition for "Writ of Certiorari" to the United States Supreme Court on behalf of The Alliance Foundation, Inc., the other Plaintiff corporations connected with this action (Alliance Capital, Inc.; Alliance International Development Corp.; General Homes, Inc.) and myself, appealing the transfer and other Court actions, as well as, questioning the validity of the Complex Litigation Docket and Managerial Judging within this Court/ Docket. The three questions presented before the U.S. Supreme Court in the Petition are:

I Is an Interlocutory Order not-appealable where Due Process is denied a civil litigant?

II Is civil litigant's Due Process not violated when the litigant is denied counsel?

III Does pretrial managerial judging in Complex Litigation Courts violate Due Process when the courts depart from state adjudication standards without a well-publicized body of rules and procedures that is accessible to all litigants?

On August 2, 2001, the Clerk of the United States Supreme Court denied the Petition stating that the 90 days period to file the petition had expired. The U.S. Supreme Court tolled the time from an April 27, 2001 partial Order issued by the Connecticut Supreme Court and not, as stated in the petition, from a complete and final order issued on May 7, 2001(see August 2, 2001 computer generated letter, original is in Connecticut)

On August 3, 2001, I filed a "Motion Directing the Court to File the Petition", contesting the Court's decision, arguing that the April 27, 2001 Connecticut Supreme Court Order was incomplete and could not stand on its own merit. On August 8, 2001, I further filed an Addendum to the Motion asking the distinguished U.S. Supreme Court to review the validity of the Connecticut Supreme Court April 27, 2001 Order, and the wording of its May 7, 2001 Order.

Late in the day on August 8, 2001 and following a review of our motion and addendum, the United States Supreme Court issued a letter accepting the July 30, 2001 filing date and thereby the May 7, 2001 Connecticut Supreme Court Order from which the 90 days tolled. In its letter, the United States Supreme Court requested that I file a new Petition within 60 days of the date of the letter primarily correcting the size of the booklet; removing the names of the other plaintiffs from the cover page (as pro se, I could not represent the

corporations); and requesting that I direct the appeal to the Connecticut Appellate Court vs. the Connecticut Supreme Court (see attached August 8, 2001 letter.) On inquiry during the preparation of the Petition I was told both by outside counsel and the U.S. Supreme Court Clerk that the Connecticut Courts could not be listed as Respondents in this Petition.

On August 13, 2001, a corrected Petition for "Writ of Certiorari" (40 new booklets) was filed and received a docket No. 01-258. According to the U.S Supreme Court Clerk, the Defendants/Respondents will have 30 days to respond to the Petition after which time (could be several months) the U.S Supreme Court will render its decision.

On August 14, 2001, the U.S. Supreme Court issued a formal letter listing the July 30, 2001 as the filing date and placing the petition on the docket as of August 13, 2001 as No. 01-258 (see attached August 14, 2001 letter.)

Now on a more personal note:

While in D.C visiting with a new acquaintance, a doctor, at his practice (he was helpful in carrying and protecting the Petition booklets during a lengthy down pour), I met a Jordanian/Palestinian patient who was there for a physical exam renewing his taxicab's license. Considering the recent horrible suicide bombings in Israel it was hard for me to pursue a conversation with this man (in his early fifties) who first asked for my help in spelling the word "Paramount" on a document he was filling out and later proceeded to ask me where I was from.

Deciding to override my feelings in an attempt to reach out and understand his psyche, I told him that my parents who were born in Baghdad, Iraq, immigrated to Israel when I was a few months old. " Oh, you are a Jew" he exclaimed, seemingly disappointed. I acknowledged.

In a conversation that lasted about 30 minutes, I went on to name some popular Arabic singers to which he was surprised and delighted; I shared with him my visit to Amman Jordan in November 1995 (the Economic Summit) and my appreciation for the late King Hussein's efforts on behalf of peace, to which he had no special reaction, and my sadness for the loss of Prime Minister, Yitzhak Rabin and the peace process, to which he had no special reaction either. I then suggested that if Arabs and Israelis worked together, peacefully, they could build the Middle East to be so successful that it could compete with Europe and the U.S. To that, the man jumped with excitement and said: "Oh, but we could even be better than them..." His reaction was instinctive and genuine.

Although I made special attempt to "win him over" and he called me "my cousin", the conversation was cautious and intense. He then passionately asked why don't the Israelis give up the land for peace to Syria and to the Palestinians like they did with Egypt with which they enjoyed a lasting peace, because otherwise, he said, "Israel would only last-- maybe 20 years", I felt the blood rushing to my head. I then politely asked him how much land did he think the Israelis had to give up in order to secure peace? He intensely suggested that the Israelis should go back to the 1967 borders, prior to the Six Day War. I then asked the man if giving up this land would indeed secure peace between the Israelis and their Palestinian cousins, as he called them? The man replied: " There are no guaranties, of course. You have to trust God. You can't just be scared Israelis" and then he made gestures mimicking "scared" Israelis, " if not in this life maybe in the next life. There's another life after this you know" he said with certainty. Once again, I felt the blood rushing to my head. He smiled at me and affectionately said that I reminded him of a very close relative and then left.

Once he was gone, my heart wept. It wept for the emotional and physical manipulation and abuse of simple folk by fanatic leaders who thrive on chaos and destruction. The lack of constructive and productive leadership in a region that only a few

years ago showed such promise through global political dialogue and budding economic negotiations and partnerships. My heart wept for the confusion and mixed passions... and for lost opportunities. I thought about Mandela, and Gandhi, and Rabin and Saadat, and wondered how much longer does the Middle East have to endure before someone with their stature, vision, courage and charisma would come along to stop this Dance of the Devil and illuminate the way for peoples so lost yet so hungry for and deserving of life, liberty and the pursuit of happiness?

Warmest personal regards from me to you, always.

Yvonne Liebel,

The Alliance Foundation, Inc.
Founder and CEO

P.S. For copies of the Petition for "Writ of Certiorari" booklet, the Motion dated August 3, 2001, and the Addendum dated August 8, 2001, please contact me personally at:

Yvonne Liebel, The Alliance Foundation, Inc.
The Alliance Institute for Peace
106 Great Hill Road
Ridgefield, CT 06877
E-mail: yliebel @ aol.com
Tel: (203) 438-4677 Cell: (310) 435-0769 (you may have to dial 2-3 times)
Fax: (203) 438-0040 or (310) 657-2731

- Any contributions to The Alliance Foundation, Inc. and/or legal assistance will be most welcome.

Attachment 2:

ZELDES, NEEDLE & COOPER
A Professional Corporation

Attorneys at Law
1000 Lafayette Blvd.
Post Office Box 1740
Bridgeport, Connecticut 06601-1740
Telephone (203) 333-9441
Fax (203) 333- 1489

Frank J. Silvestri, Jr.
Direct Mail 203 332-5775
E-Mail fsilvestri@znclaw.com

May 14, 2001

VIA FACSIMILE
AND U.S. MAIL

Ms. Yvonne Liebel
c/o DHA
8913 Olimpic Blvd.
Beverly Hills, CA 90211

Re: Alliance Foundation Inc. et al v. Eugene Grant, et al

Dear Yvonne:

It was a pleasure meeting you last Friday and learning about your case.

I have discussed the matter with Mr. Zeldes and with our screening committee. I am sorry to report that our firm declines to undertake this matter.

We appreciate the fact that you considered retaining us, and wish you the best in the lawsuit and your future endeavors.

Cordially,

Frank J. Silvestri, Jr.

FJS: dbr

Attachment 3:

SUPREME COURT OF THE UNITED STATES
OFFICED OF THE CLERK
WASHINGTON, DC 20543-0001

William K. Suter
Clerk of the court

August 2, 2001

Area Code 202
479-3011

Yvonne Liebel
106 Great Hill Road
Ridgefield, CT 06877

RE: Yvonne Liebel v. Eugene Grant, et al.

Dear Ms. Liebel:

The above-entitled petition for writ of certiorari hand-delivered on July 30, 2001, is herewith returned for the following reason (s):

The petition is out–of-time. The date of the lower court judgment or order denying a timely petition for rehearing was April 27, 2001. Therefore, the petition was due on or before July 26, 2001. Rules 13.1, 29.2 and 30.1. When the time to file a petition for a writ of certiorari in a civil case (habeas action included) has expired, the Court no longer has the power to review the petition.

The May 7, 2001, letter from the Supreme Court of Connecticut to you does not toll the time within which to file a petition for writ of certiorari.

Your $300.00 check (#716) is herewith returned.

Sincerely,

William K. Suter, Clerk
By:
Gail Johnson
(202) 479-3038

Enclosures

SUPREME COURT OF THE UNITED STATES
OFFICED OF THE CLERK
WASHINGTON, DC 20543-0001

William K. Suter
Clerk of the court

August 8, 2001

Area Code 202
479-3011

Yvonne Liebel
106 Great Hill Road
Ridgefield, CT 06877

RE: Yvonne Liebel v. Eugene Grant, et al.

Dear Ms. Liebel:

Returned are copies of the petition for a writ of certiorari originally received on july 30, 2001, and received again on august 8, 2001, which fails to comply with the rules of the Court.

If you intend to pay the $300 docket fee, the petition must be in booklet format and on paper that measures 6 1/8 by 9 ¼ inches. Rule 33.1 (a).

The appendix to the petition as required by rule 14 must be in booklet format and on paper that measures 6 1/8 by 9 ¼ inches. Rule 33.1 (a).

The caption of the case must appear as appropriate in this Court. Rule 34.1 (c).

The additional petitioners listed on the cover of the petition must be removed. The petition should be directed to the Appellate Court of Connecticut.

The text of the petition and appendix must be typeset Roman 11-point or larger type with 2-point or more leading between lines. The typeface of footnotes must be 9-point or larger with 2-point or more leading between lines. Please note that computer generated "Roman" font is smaller than traditional Roman type and you may need to increase the font size. Rule 33.1 (b).

Kindly correct the petition and appendix so that it complies in all respects with the Rules of the Court and return it to this office promptly so that it may be docketed. Unless the petition is received by this office in corrected form within 60 days of the date of this letter, the petition will not be filed. Rule 14.5

Three copies of the corrected petition must be served on opposing counsel. Rule 29.3.

This office shall retain one copy of the petition and your check in the amount of $300.00 in expectation of timely receipt of a properly prepared petition.

Sincerely,

William K. Suter, Clerk
By:
Gail Johnson
(202) 479-3038

Enclosures

SUPREME COURT OF THE UNITED STATES
OFFICED OF THE CLERK
WASHINGTON, DC 20543-0001

William K. Suter
Clerk of the court

August 14, 2001

Area Code 202
479-3011

Yvonne Liebel
106 Great Hill Road
Ridgefield, CT 06877

RE: Yvonne Liebel
v. Eugene Grant, et al.
NO. 01-258

Dear Ms. Liebel:

The Petition for a Writ of Certiorari in the above entitled case was filed July 30, 2001 and placed on the docket August 13, 2001 as No. 01-258.

Forms are enclosed for notifying opposing counsel that the case was docketed.

Sincerely,

William K. Suter, Clerk
By:
Gail Johnson
Assistant

Enclosures

APPENDIX B

A sample Notice:

Grant, Eugene M. VS.
Alliance Foundation CV-01-01B4856-S (xo5)

Notice:

THE HONORABLE CHASE ROGERS< PRESIDING JUDGE OF THE COMPLEX LITIGATION DOCKET AT STAMFORD IS RECUSED FROM THIS CASE. THIS CASE WILL BE REASSIGNED

BY THE CHIEF ADMINISTRATIVE JUDGE OF THE CIVIL DIVISION.

BECAUSE OF RECUSAL BY THE COURT< THE HEARING SCHEDULED FOR SEPTEMBER 12, 2001 IS CANCELLED>

R. RUSH, COURT OFFICER

Kevin W. Ahern
33 Heritage Hill Road

SUPERIOR COURT
123 HOYT STREET
STAMFORD, CONNECTICUT 06905

Branford CT 06405

DATED: SEP 05, 2001
FST

APPENDIX C

A Sample Notice:

JUDICIAL INFORMATION SYSTEMS REPORT DATE 9/20/2001
COUNSEL/PRO SE NOTIFICATION REPORT PAGE 01 OF 01

PLAINTIFF- ATTORNEYS AND PRO SE PARTIES

YVONNE LIEBEL
54 DANBURY RD. SUITE 300
RIDGEFIELD, CT 06877

JOYCE A. MORIN
559 RTE 6
P.O.BOX 110
MAHOPAC, NY 10541

DEFENDANT-ATTORNEYS AND PRO SE PARTIES

ROBINSON & COLE
FINANCIAL CENTRE
PO BOX 10305
STAMFORD CT 06904

RUCCI BURNHAM CARTA & ED
800 POST ROAD
PO BOX 1107 DARIEN CT 06820

CURTIS MALLET-PREVOST CO
FINANCIAL CENTRE
695 EAST MAIN ST
STAMFORD CT 06904

HALLORAN & SAGE
315 POST ROAD WEST
WESTPORT CT 06880

DOCKET NUMBER: CV-01-0183162-S (XO5)
CASE CAPTION: ALLIANCE FOUNDATION E
VS:
GRANT, EUGENE E

THIS CASE HAS BEEN TRANSFERRED TO THE HONORABLE MICHAEL SHELDON OF THE WATERBURY COMPLEX LITIGATION DOCKET FOR ALL FURTHER PROCEEDINGS.

A NEW DOCKET NUMBER WILL BE ASSIGNED BY THE WATERBURY COURT.

THE COURT OFFICER ASSIGNED TO THIS CASE IS BRENDA HAMILTON, ESQ. 203-236-8232

R.RUSH, COURT OFFICER
STAMFORD COMPLEX LITIGATION DOCKET

SUPERIOR COURT
123 HOYT STREET
STAMFORD, CONNECTICUT 06905

DATED: SEP 20, 2001
FST STAMFORD

APPENDIX D

Yvonne Liebel

8913 Olimpic Blvd, Suite 101, Beverly Hills, CA 90211
Tel: (310) 657- 2771 Fax: (310) 657-2731

October 28, 2001

Via Fax: (203) 236-8234 (2 pages)

Brenda M. Hamilton, Court Officer
Superior Court
Complex Litigation Docket
400 Grand Street
Waterbury, CT 06702
Phone: (203) 236-8232

Re: The Alliance Foundation, Inc. et al. v. Eugene Grant, et al
Eugene Grant v. The Alliance Foundation, Inc.
Eugene Grant v. Alliance Capital, Inc.
Eugene Grant v. Alliance Capital, Inc.

Liebel v. Grant et al
United States Supreme Court: Case No.: 01-258

Dear Ms. Hamilton:

Pursuant to your message on my cell phone (310-435-0769) on Tuesday, October 23, 2001 (approx. 2:35 pm West Coast time) and our subsequent conversation on the following day, October 24, 2001, this notice is to confirm that the Initial Status Conference scheduled for October 29, 2001 at 2:15pm at the Waterbury Complex

Litigation Docket at Waterbury is **MARKED OFF** pending United States Supreme Court (Docket No.01-258) decision appealing the Complex Litigation Docket's jurisdiction, anywhere within the State of Connecticut over the above cases and returning them to their original court at the Danbury Superior Court at Danbury.

In addition, one of the issues raised in the Petition for Writ of Certiorari is the absence of Counsel to represent the above cases. Attorney Kevin Ahern listed as legal counsel representing the 3 Grant v. Alliance cases in the documents you faxed me on October 24, 2001 with regard to the conference, resigned earlier this year and his resignation was accepted in July 2001. Attorney Joyce Morin who represented Alliance, et al v. Grant, et al., and DTL-USA and Yvonne Liebel v. Ridgefield Bank, also resigned in June 2001 and her resignation was accepted in July 2001. In July 2001, a notification of their resignation and acceptance of said resignation was sent to: Hon. Judge Tierney at the Complex Litigation Docket in Stamford; the Danbury Superior Court at Danbury; the Appellate/Supreme Court of the State of Connecticut; to all counsel of record and to the United States Supreme Court (as described and evidenced in the Petition).

I would also like to confirm in this notice that it was during our conversation on October 24, 2001, that I first learned about the above cases being transferred from the Stamford Complex Litigation Docket to the Waterbury Complex Litigation Docket five weeks ago (as you know, I was in California since August 26, 2001 due to my father's illness and awaiting the U.S. Supreme Court decision). According to you, the transfer was a result of a conflict-of-interest stemming from the Presiding Judge and one of the Defendants' law firms (you had no knowledge which law firm). I thought, of course, that the conflict had to do with Hon. Judge Tierney who presided over and persisted for the past 11 months on transferring these cases from the Danbury Superior Court to his Court. Upon further inquiry (I called Attorney Kevin Ahern) I learned that Judge Tierney was actually himself transferred to another district (the name of

which was unknown to Ahern as the Court Officer, Rose Anne Rush, did not wish to disclose this information) and the conflict-of-interest had to do with the new presiding Judge, Hon. Chase Rogers, it was therefore that the cases were transferred to Waterbury Complex Litigation Docket.

It is my understanding that in accordance with Connecticut law the above cases are under the jurisdiction of the Danbury Superior Court until such time that the United States Supreme Court decides this matter. Therefore, I do not wish to change my official mailing address as you suggested in your letter. However, I would greatly appreciate if meanwhile you could mail or fax to me any future communications to the California address and fax number listed on this stationary. I will be happy to pay for any additional expenses associated with this matter. For your information, the United States Supreme Court is scheduled to review the Petition for Writ of Certiorari on November 9, 2001.

I thank you in advance for your time and assistance.

Very truly yours,

Yvonne Liebel, pro se
Founder and CEO, The Alliance Foundation, Inc.
President, Alliance Capital, Inc.
President, General Homes, Inc.
President, DTL-USA, Inc.
President, Alliance International Development, Inc.

CC by fax to:
All Counsel of Record
Mr. Frank Lorson, Chief Deputy Clerk, United States Supreme Court (note: I was unable to fax Mr. Lorson)

APPENDIX E

VIA FAX 310- 657-2731

TO: Yvonne Liebel

FROM: Linda Rinaldi
Waterbury Superior Court
400 Grand Street
Waterbury, CT 06702

To confirm our telephone conversation today, I will prepare an expedited transcript of yesterday's hearing in the case of The Alliance Foundation cases. I estimate the transcript to be 30 pages and the cost is $3.50/page for expedited service.

Please fill out and return via fax the form that accompanies this fax transmission. Our fax is 203-236-8198. I will mail the transcript to you via overnight mail.

APPENDIX F

KEVIN W. AHERN
Attorney at Law
33 heritage hill road, Branford, ct, 06405
tel 203 488-4520, fax 203 488-1465, e-mail kwsahe @earthlink.net

October 30, 2001
Yvonne Liebel
106 Great Hill Road
Ridgefield, CT 06877

Re: Grant v. Alliance Capital, Inc.
Grant v. Alliance Capital, Inc.
Grant v. The Alliance Foundation, Inc.

Dear Eva;

My motions to withdraw from the above cases have been granted. The defendants in these cases need to have a new attorney file appearances in these cases immediately. If they do not, the defendants in these cases may not receive notices or copies of pleadings from the Court or opposing counsel. Opposing counsel may also move to default the defendants.

Thank you for your kind attention.

Sincerely,

Kevin W. Ahern

Cc: sent to Fax number 310-657-2731

MOTIONS TO STAY FILED IN DANBURY AND WATERBURY SUPERIOR COURTS WITH COPIES TO APPELLATE/SUPREME COURT

Yvonne Liebel

P.O. Box 1153
Ridgefield, Connecticut 06877
Cell: 310-435-0769

8913 Olympic Blvd. Suite 101
Beverly Hills, California 90211
Tel: 310-657-2771
Fax: 310-657-2731

August 29, 2002

Via Fax: (203) 236-8234 and First class U.S. Mail (cover plus 3 pages)

203-596-4023
Clerk of the Court
Waterbury Superior Court, 300 Grand Street

203-236-8232
Complex Litigation Docket, 400 Grand Street
Waterbury, CT 06702 (Att. Melanie/ Hon. Sheldon, J.)

Re: The Alliance Foundation, Inc. et al vs. Eugene Grant et al No. (X02) CV-01-0167482
Eugene M. Grant vs. The Alliance Foundation, Inc. No. (X02) CV-01-0167556
Eugene M. Grant vs. Alliance Capital, Inc. No. (X02) CV-01-0167457
Eugene M. Grant vs. Alliance Capital, Inc. No. (X02) CV-01-0167458

Dear Sir/Madam:

Faxed please find for filing a Motion to Stay all legal proceedings in the above docketed cases until ruling is rendered by the Supreme Court of the United States on the pending Petition for

Writ of Certiorari I filed on behalf of myself and the corporations on July 2, 2002.

Also, I'm mailing to you an original for each of the four docketed cases.

Thank you for your time and attention.

Very truly yours,

/S/Yvonne Liebel, pro se,
Shareholder, Founder and CEO:
The Alliance Foundation, Inc.
Alliance Capital, Inc.
General Homes, Inc.
DTL-USA, Inc.
Alliance International Development, Inc.

CC: per Certification page

Yvonne Liebel

P.O. Box 1153
Ridgefield, Connecticut 06877
Cell: 310-435-0769

8913 Olympic Blvd. Suite 101
Beverly Hills, California 90211
Tel: 310-657-2771
Fax: 310-657-2731

August 29, 2002

DANBURY SUPERIOR COURT
JUDICIAL DISTRICT OF DANBURY
AT DANBURY
146 White Street
Danbury, CT 06810

By Fax: 3 pages with cover 203-207-8642

Attn: Ms. Robin Smith
Deputy Chief clerk

Re: The Visiting Nurse Assoc. vs. The Alliance Foundation, Inc. No. SP02-10636
DTL-USA, Inc. and Yvonne Liebel vs. Ridgefield Bank No. CV 00 0338142 S
Rene Heinecke vs. Yvonne Liebel CV 98 333546 S

Dear Robin:

Faxed please find for filing a Motion to Stay all legal proceedings in the above docketed cases until ruling is rendered by the Supreme Court of the United States on the pending Petition for Writ of Certiorari I filed on behalf of myself and the corporations on July 2, 2002. The dead line given to me by the Court to file an amended petition is September 16, 2002.

I'm mailing to you today an original for each of the three docketed cases.

Thank you for your time and attention.

Very truly yours,

Yvonne Liebel, pro se,
Shareholder, Founder and CEO:
The Alliance Foundation, Inc.
Alliance Capital, Inc.
General Homes, Inc.
DTL-USA, Inc.
Alliance International Development, Inc.

CC: per Certification page

CERTIFICATION

I, Yvonne Liebel of 106 Great Hill Road, Ridgefield, Connecticut 06877, hereby certify that on this date, August 29, 2002, that I have served the attached Motion to Stay on each party to the proceeding or that party's counsel, by faxing and by depositing an envelope containing the document in the United States mail, properly addressed to each of them, and prepaid as follows:

Joseph Clasen, Esq. (counsel/ Grant)
Robinson & Cole, LLP
695 E. Main St.
P.O.Box 10305, Stamford, CT 06904
Tel: (203) 462-7500 Fax: (203) 462-7599

Brian C.Wille, Esq (Nagro/Solomon)
Costelanetz and Fink, LLP
530 Fifth Ave.
New York, NY 10036
Tel: (212) 808-8100 Fax: (212) 808-8108

Michael K. Stanton, Jr. Esq. (counsel for Weil, Gotshal and Manges; Mark Hoenig; David Stone; Bridge To Brotherhood, Inc.; Ira Millstein; and Marvin Jacob)
Curtis Mallet-Prevost, Mosle, LLP
695 E. Main St., Stamford, CT 06901
Tel: (203) 359-6200 Fax: (203) 328-2617

Stephen Fogerty, Esq. (Ridgefield Bank)
Halloran & Sage LLP
315 Post Road West
Westport, CT 06880
Tel: (203) 227-2855 Fax: (203) 227-6992

Herbert F. Rosenberg, Esq.
80 Grove Street
Ridgefield, CT 06877
Tel: (203)-438-5324
Fax: (203)-431-4021
(VNA)

John R. Williams, Esq.
Williams and Pattis,
51 Elm Street,
New Haven, CT 06510
Tel: (203)562-9931
Fax: (203)776-9494

Stephen Gerard, Senior Partner
PricewaterhouseCoopers, LLP/Kesselman man, LLP
1177 Ave. of the Americas
New York, NY 10036
Tel: (646) 471-4000

Thomas Reynolds, Senior Partner
Reynolds and Rowella, LLP
90 Grove St.
Ridgefield, CT 06877
Tel: (203) 438-0161

Christopher Molyneaux, Esq.
Law Offices of Norman Voog
90 Grove Street
Ridgefield, CT. 06877
(counsel for Rene Heinecke)
(203) 438-3716

COURTESY COPIES

Appellate/Supreme Court/ Chief clerk of the Court/ Francis J. Drumm, Jr. 231 Capitol Avenue, Drawer Z, Station A, Hartford, CT 06106 Fax; 860-757-2217

Hon. Michael R. Sheldon c/o Brenda Hamilton, Esq. (The Alliance Foundation, Inc. et al v. Grant et al)
Waterbury Superior Court, Complex Litigation Docket
400 Grand Street, Waterbury, CT 06702 (Tel: 203-236-8232 Fax: 203-236-8234)

Hon. Ginocchio, J. c/o Robin Smith, Esq. (Visiting Nurse Assoc. v. The Alliance Foundation, Inc.)
Danbury Superior Court (Housing)
146 White St., Danbury, CT 06810 (Tel: 203-207-8600 Fax: 203-207-8642)

* Clerk of the Court c/o Robin Smith, Esq. (Washington Mutual Bank vs. Yvonne Liebel; Heineke vs. Liebel; DTL-USA, Inc. and Yvonne Liebel vs. Ridgefield Bank)
Danbury Superior Court (Civil)
146 White St., Danbury, CT 06810
(Tel: 203-207-8600 Fax:203-207-8642)

/S/ YVONNE LIEBEL

Docket Numbers:
(XO2) CV-01-0167482
(X02) CV-01-0167556
(X02) CV-01-0167457
(X02) CV-01-0167458

YVONNE LIEBEL, ET AL.,	:	**STATE OF CONNECTICUT**
VS.	:	**WATERBURY SUPERIOR**
	:	**COMPLEX LITIGATION DOCKET**
EUGENE M. GRANT, ET AL.	:	
	:	**AUGUST 28, 2002**

MOTION TO STAY

COMES NOW, YVONNE LIEBEL, et al., in the above-docketed cases presents this Motion to Stay, and shows unto the Court as follows:

1. All of the above-docketed cases are before this Honorable Court.
2. The above-docketed cases are clearly related as they arise out of the same or similar events, circumstances and/or occurrences. Yvonne Liebel and her corporations are implicated in all these cases and she either prosecutes or defends on behalf of herself and/or her corporations.
3. Eugene Grant and others on the opposing side of Yvonne Liebel and her corporations, have resorted to abusive and dilatory tactics such as filing retaliatory lawsuits, numerous pleadings and motions to the Court to bury her in a deluge of paperwork for the purpose of harassment, intimidation, undue delay and annoyance.
4. By inundating the Court with such pleadings and motions, the opposition has made it nearly impossible

for Yvonne Liebel to prosecute and defend said actions separately.

5. Yvonne Liebel, et al. filed a petition for writ of certiorari before the Supreme Court of the United States implicating said docketed cases. Ms. Liebel was given sixty days to make certain amendments to the petition.

6. The pending writ of certiorari and painstaking work involved before final drafting for presentation to the Supreme Court of the United States prevents her from effectively prosecuting or defending said cases.

WHEREFORE, Yvonne Liebel, et al., prays the Court to Stay said cases until a ruling is made by the Supreme Court of the United States on the petition for writ of certiorari.

Respectfully submitted,

_____

/S/Yvonne Liebel

CERTIFICATE OF SERVICE

This is to certify that I have on the __29th_day of _August__, 2002, served a copy of the foregoing document by fax and by depositing the same in the United States mail, properly addressed with postage prepaid upon the following counsel of record:

(See attached certification page)

Docket Numbers:
CV 00 0338142 S
SP02-10636
CV: 98-0333546-S

YVONNE LIEBEL, ET AL.,	:	**STATE OF CONNECTICUT**
VS.	:	**DANBURY SUPERIOR COURT**
VISITING NURSE ASSOCIATION OF RIDGEFIELD, INC., ET AL.	:	**AUGUST 28, 2002**

MOTION TO STAY

COMES NOW, YVONNE LIEBEL, et al., in the above-docketed cases presents this Motion to Stay, and shows unto the Court as follows:

1. All of the above-docketed cases are before this Honorable Court.
2. The above-docketed cases are clearly related as they arise out of the same or similar events, circumstances and/or occurrences. Yvonne Liebel and her corporations are implicated in all these cases and she either prosecutes or defends on behalf of herself and/or her corporations.
3. Ridgefield Bank, Visiting Nurse Association of Ridgefield, Inc., Rene Heinecke and others on the opposing side of Yvonne Liebel and her corporations, have resorted to abusive and dilatory tactics such as scheduling depositions, filing retaliatory lawsuits, numerous pleadings and motions to the Court to bury her in a deluge of paperwork for the purpose of harassment, intimidation, undue delay and annoyance.
4. By inundating the Court with such pleadings and motions, the opposition has made it nearly impossible for Yvonne Liebel to prosecute and defend said actions separately.

5. Yvonne Liebel, et al. filed a petition for writ of certiorari before the Supreme Court of the United States implicating said docketed cases. Ms. Liebel was given sixty days to make certain amendments to the petition.
6. The pending writ of certiorari and painstaking work involved before final drafting for presentation to the Supreme Court of the United States prevents her from effectively prosecuting or defending said cases.

WHEREFORE, Yvonne Liebel, et al., prays the Court to Stay said cases until a ruling is made by the Supreme Court of the United States on the petition for writ of certiorari.

Respectfully submitted,

_____

/S/**Yvonne Liebel**

CERTIFICATE OF SERVICE

This is to certify that I have on the __29th_day of _August__, 2002, served a copy of the foregoing document by fax and by depositing the same in the United States mail, properly addressed with postage prepaid upon the following counsel of record:

(See attached certification page)